

CITY OF BOSTON



2000 LINKED DEPOSIT BANKING REPORT TO THE MAYOR





Prepared March 2002 by NobleAssociates

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The State of Banking in the City of Boston



Mergers and acquisitions continue to be a major factor in the Boston banking landscape. In the year 2000, Citizens Bank purchased US Trust. Fleet completed the largest branch divestiture in US history with its sale of branches to Sovereign Bank.

The existing neighborhood banks (Hyde Park Cooperative, Hyde Park Savings, Century Bank & Trust, Eastern Bank, East Boston Savings Bank, Liberty Bank & Trust) responded to this continuing consolidation by shifting their business focus in order to compete more successfully. In many cases, the focus was redirected away from mortgage lending towards commercial or small business development lending. Fewer mortgage loans, mean fewer programs in smaller banks for low-income and moderate-income homebuyers.

Other influences have effected low to moderate-income purchases as well. In the year 2000, already high housing costs continued to increase. According to Harvard University's Office of Community Affairs, "Bostonians can find virtually no private housing in the price range deemed affordable by the federal government, where housing costs consume no more than 30% of household income."¹ The average selling price for a single-family house in the Bay State increased 19% from November 1999 to November 2000.² Late in the year 2000, the first signs of weakening economy appeared, along with reductions in mortgage lending rates. Concerns were widespread about weakened consumer's confidence subsequent effect on the economy.

Americans were utilizing the Internet more and more, for mortgage information, and some, to actually apply on-line. 56% of homebuyers used the Internet for mortgage information, and 4% applied on-line. Only 2%, however, completed the entire mortgage process over the Internet.³

¹ Harvard University, Opportunities for partnership in Affordable Housing, www.news.harvard.edu/community/housing/part1

² Boston Globe, Home Sales Stay Strong in November, December 29, 2000.

³ Boston Globe, Survey: Americans see Web Mortgages as Norm, December 30, 2000.

Against this backdrop, some area banks continued to create, or participate in, programs to assist borrowers in securing a mortgage. Among the notable banks were:

- Citizens Bank expanded its branch presence and continued its commitment to making home ownership a reality to City of Boston residents;
- Fleet's large branch presence provides services to a large percentage of the Boston population.

Sovereign Bank New England - having acquired over 250 branches in New England from Fleet Boston, arrived on the Boston banking scene mid 2000.

Other banks have also provided funding or services to the City of Boston and its residents as documented in this report.

According to the regulators, Boston Bank of Commerce has found itself in a unique position.

The State of Banking in the City of Boston

In order to support the only "minority owned bank" in the Boston area, the City of Boston, and other municipalities, have deposited large sums of money which are required to be secured. Consequently, Boston Bank of Commerce has not been able to lend these funds to prospective borrowers. Therefore, as the assets of the bank have increased steadily over the past several years, the actual lending for mortgages and other activities has declined.

The smaller banks, of course, have fewer branches and ATM access for the neighborhoods served.

The low-income and moderate-income neighborhoods are being served adequately by their access to branch services and ATMs. However, all future mergers should be reviewed carefully by the City of Boston to ensure that no further deterioration takes place as branches are closed or consolidated.

The highest percentage of employees in the banking industry is women. Women are not adequately represented in the professional ranks of banking institutions. Minorities continue to



be fewer in number and in the professional arena, their numbers drop appreciably.

Overall, the City of Boston needs to continue to monitor the activities of these banking institutions to ensure that all the citizens of Boston are receiving adequate banking services. Continuous, year-over-year tracking is needed to determine the net effect that changes in the banking industry have on the residents of the City of Boston.

Boston MSA Comparative Charts

The charts on the following three pages give different views of the mortgage lending activity in the Boston MSA.

In the first two charts, lending totals of all lenders (the lenders listed in this report is a subset of this total) in the MSA is broken down by race for HMDA and low-income mortgages respectively. These charts include all HMDA and low-income mortgages within the MSA.

The third chart totals all HMDA and low-income reportable mortgages, by race, for the banks listed in this report (excluding Mellon) compared against the entire MSA.

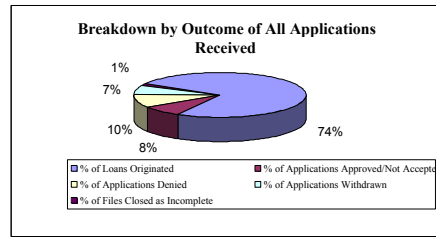
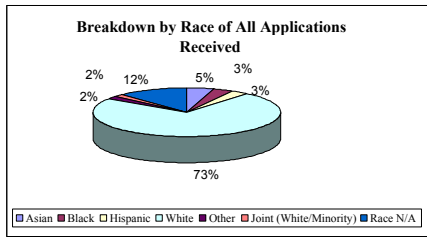
Aggregate Lending Information - HMDA

MSA: 1120 - Boston, MA - NH

2000

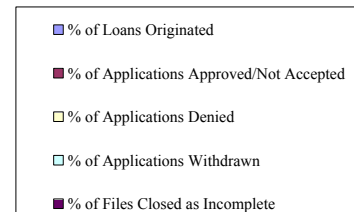
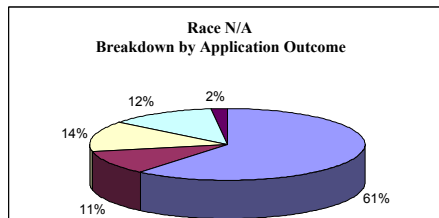
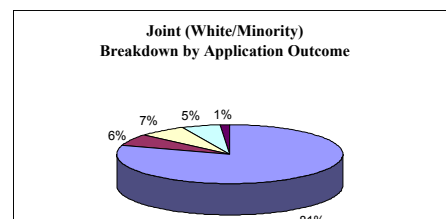
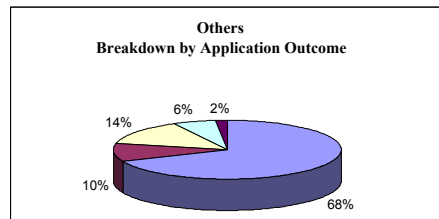
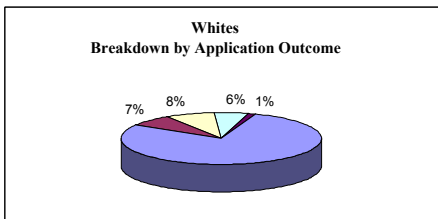
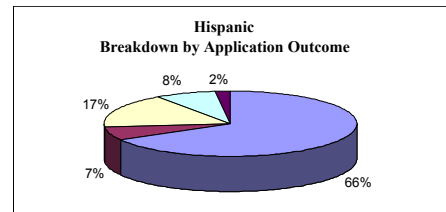
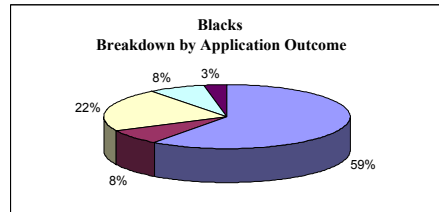
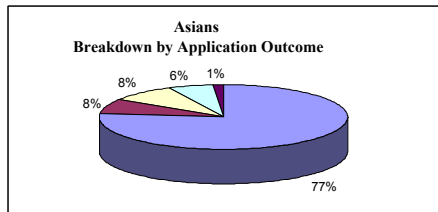
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	2938	5%	2252	77%	224	8%	246	8%	173	6%	43	1%
Black	2059	3%	1237	60%	159	8%	443	22%	158	8%	62	3%
Hispanic	1947	3%	1299	67%	127	7%	331	17%	154	8%	36	2%
White	46037	73%	35935	78%	3301	7%	3683	8%	2550	6%	568	1%
Other	1129	2%	771	68%	112	10%	157	14%	70	6%	19	2%
Joint (White/Minority)	1046	2%	838	80%	66	6%	70	7%	57	5%	15	1%
Race N/A	7679	12%	4668	61%	827	11%	1074	14%	959	12%	151	2%
Total	62835	100%	47000	75%	4816	8%	6004	10%	4121	7%	894	1%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.



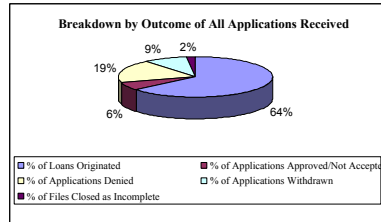
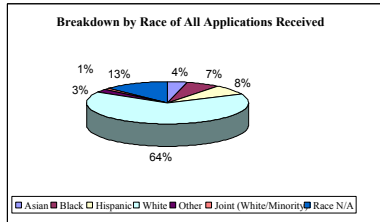
Aggregate Low-Income Mortgage Lending

MSA: 1120 - Boston, MA - NH

2000

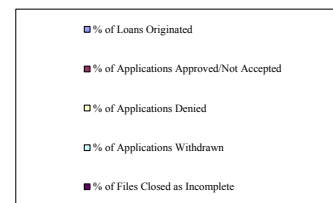
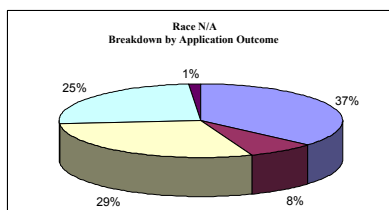
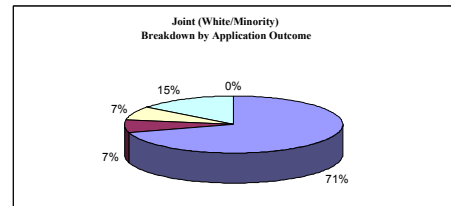
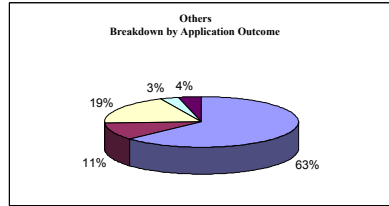
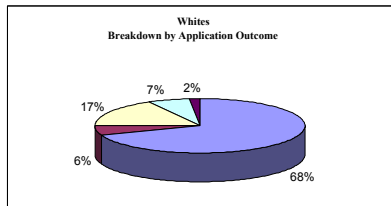
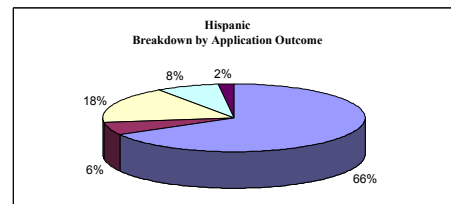
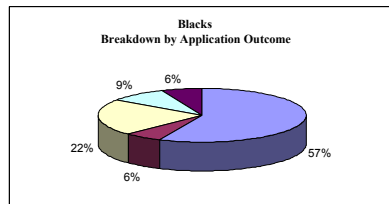
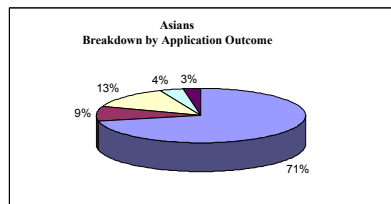
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	138	4%	99	72%	12	9%	18	13%	5	4%	4	3%
Black	237	7%	134	57%	14	6%	53	22%	21	9%	15	6%
Hispanic	268	8%	179	67%	16	6%	47	18%	21	8%	5	2%
White	2299	65%	1595	69%	132	6%	386	17%	150	7%	36	2%
Other	101	3%	64	63%	11	11%	19	19%	3	3%	4	4%
Joint (White/Minority)	27	1%	19	70%	2	7%	2	7%	4	15%	0	0%
Race N/A	463	13%	168	36%	37	8%	136	29%	116	25%	6	1%
Total	3533	100%	2258	64%	224	6%	661	19%	320	9%	70	2%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

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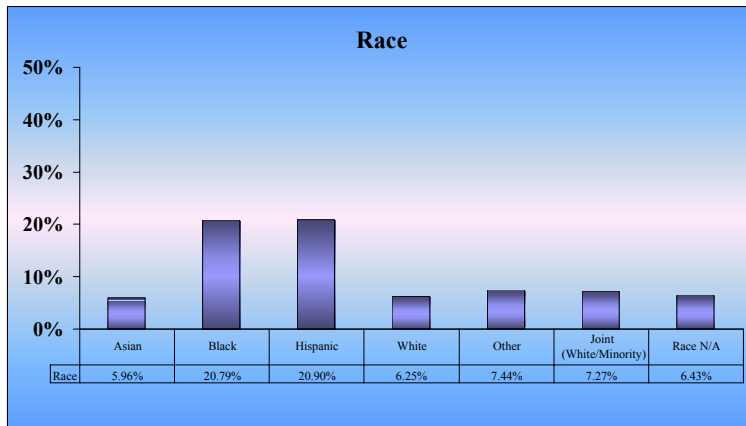
Link Deposit Report Banks Compared Against the MSA Aggregate Tot

2000

HMDA Mortgage Information for Banks covered in this report (excluding Mellon)

Race	Applications Received by banks	% of Applications Received in MSA	Loans Originated by banks	% of Loans Originated in MSA	Applications Approved/Not Accepted by banks	% of Applications Approved/Not Accepted in MSA	Applications Denied by banks	% of Applications Denied in MSA	Applications Withdrawn by banks	% of Applications Withdrawn in MSA	Files Closed as Incomplete by banks	% of Files Closed as Incomplete in MSA
Asian	175	5.96%	130	5.77%	11	4.91%	25	10.16%	8	4.62%	1	2.33%
Black	428	20.79%	309	24.98%	18	11.32%	68	15.35%	30	18.99%	3	4.84%
Hispanic	407	20.90%	281	21.63%	10	7.87%	68	20.54%	44	28.57%	4	11.11%
White	2877	6.25%	2263	6.30%	125	3.79%	357	9.69%	110	4.31%	22	3.87%
Other	84	7.44%	50	6.49%	4	3.57%	22	14.01%	7	10.00%	1	5.26%
Joint (White/Minority)	76	7.27%	62	7.40%	1	1.52%	7	10.00%	5	8.77%	1	6.67%
Race N/A	494	6.43%	244	5.23%	57	6.89%	144	13.41%	45	4.69%	4	2.65%
Total	4541	7.23%	3339	7.10%	226	4.69%	691	11.51%	249	6.04%	36	4.03%

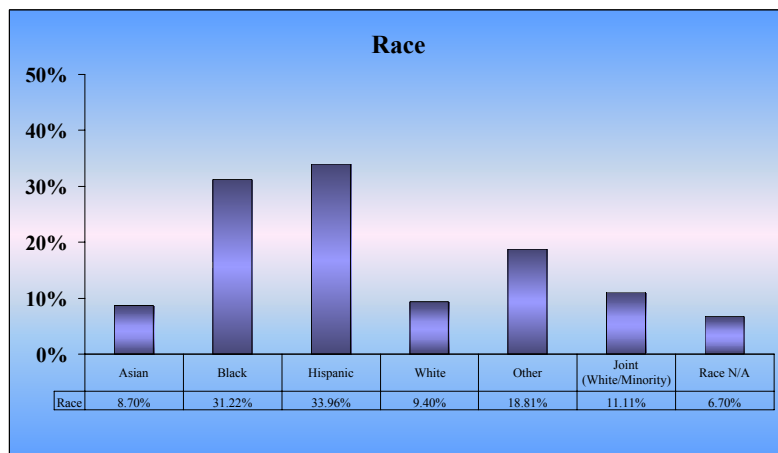
The chart below is the breakdown by race of the applications received collectively at the banks covered in this report (excluding Mellon) compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications processed collectively at the banks covered in this report (excluding Mellon) compared to the total number of Asian applications processed in the MSA.



Low-Income Mortgage Information for Banks covered in this report (excluding Mellon)

Race	Applications Received by banks	% of Applications Received in MSA	Loans Originated by banks	% of Loans Originated in MSA	Applications Approved/Not Accepted by banks	% of Applications Approved/Not Accepted in MSA	Applications Denied by banks	% of Applications Denied in MSA	Applications Withdrawn by banks	% of Applications Withdrawn in MSA	Files Closed as Incomplete by banks	% of Files Closed as Incomplete in MSA
Asian	12	8.70%	8	8.08%	0	0.00%	2	11.11%	1	20.00%	1	25.00%
Black	74	31.22%	53	39.55%	5	35.71%	12	22.64%	4	19.05%	0	0.00%
Hispanic	91	33.96%	67	37.43%	0	0.00%	14	29.79%	9	42.86%	1	20.00%
White	216	9.40%	147	9.22%	3	2.27%	56	14.51%	10	6.67%	0	0.00%
Other	19	18.81%	11	17.19%	0	0.00%	6	31.58%	2	66.67%	0	0.00%
Joint (White/Minority)	3	11.11%	1	5.26%	0	0.00%	0	0.00%	2	50.00%	0	0.00%
Race N/A	31	6.70%	9	5.36%	3	8.11%	19	13.97%	0	0.00%	0	0.00%
Total	446	12.62%	296	13.11%	11	4.91%	109	16.49%	28	8.75%	2	2.86%

The chart below is the breakdown by race of the applications received collectively at the banks covered in this report (excluding Mellon) compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications processed collectively at the banks covered in this report (excluding Mellon) compared to the total number of Asian applications processed in the MSA.





Ratings Summary



Summary

Note: Information in this section is summary only. Expanded information on all financial institutions is contained in the subsequent sections.
(see pages 3-1 to 15-1)

FDIC Review Schedule

For banks with assets of less than \$250 million the schedule is:

- Previous rating OUTSTANDING next review in 60-72 months
- Previous rating SATISFACTORY next review in 48-60 months
- Previous rating NEEDS IMPROVMENT next review in 12-24 months
- Previous rating SUBSTANCIAL NON-COMPLIANCE next review in 12 months

For banks with assets of more than \$250 million the schedule is:

- Previous rating OUTSTANDING next review in 24-36 months
- Previous rating SATISFACTORY next review in 24-36 months
- Previous rating NEEDS IMPROVMENT next review in 12-24 months
- Previous rating SUBSTANCIAL NON-COMPLIANCE next review in 12 months

OCC and OTS Review Schedule

In general, the OCC and OTS conduct a CRA examination of a bank every 24 months.

Overall Rating

The following overall Community Reinvestment Act (CRA) ratings⁴ are for the year 2000.

Bank	Rating
Boston Bank of Commerce (BBOC)	SATISFACTORY
Boston Private Bank	SATISFACTORY
Century Bank and Trust (Century Bank)	SATISFACTORY
Citizens Bank of Massachusetts	OUTSTANDING
East Boston Savings Bank (EBSB)	SATISFACTORY
Eastern Bank	SATISFACTORY
Fleet Bank	SATISFACTORY
Hyde Park Cooperative Bank	SATISFACTORY
Hyde Park Savings Bank (HPSB)	SATISFACTORY
Liberty Bank and Trust Company (Liberty Bank)	SATISFACTORY
Mellon Bank, N.A. ⁵	OUTSTANDING
Sovereign Bank	SATISFACTORY
Wainwright Bank and Trust (Wainwright Bank)	OUTSTANDING

⁴ See Appendix for rating definitions.

⁵ Based on information from Philadelphia, PA.

**Overall and Test Ratings**

The following are the ratings for the three test areas (Lending, Investment, and Service) utilized by the CRA regulatory bodies.

Boston Bank of Commerce⁶

Regulatory Body:	Federal Deposit Insurance Corporation
Rating	
Overall:	SATISFACTORY
Lending:	SATISFACTORY
Investment:	SATISFACTORY
Service:	SATISFACTORY

Boston Private Bank & Trust Company

Regulatory Body:	Federal Deposit Insurance Corporation
Area Tested	
Overall:	SATISFACTORY
Lending:	HIGH SATISFACTORY
Investment:	HIGH SATISFACTORY
Service:	HIGH SATISFACTORY

Century Bank & Trust⁷

Regulatory Body:	Federal Deposit Insurance Corporation
Area Tested	
Overall:	SATISFACTORY
Lending:	HIGH SATISFACTORY
Investment:	HIGH SATISFACTORY
Service:	HIGH SATISFACTORY

Citizen's Bank of Massachusetts⁸

Regulatory Body:	Federal Deposit Insurance Corporation
Area Tested	
Overall:	OUTSTANDING
Lending:	OUTSTANDING
Investment:	HIGH SATISFACTORY
Service:	OUTSTANDING

East Boston Savings Bank⁹

Regulatory Body:	Federal Deposit Insurance Corporation
Area Tested	
Overall:	SATISFACTORY
Lending:	OUTSTANDING
Investment:	LOW SATISFACTORY
Service:	HIGH SATISFACTORY

Eastern Bank¹⁰

Regulatory Body:	Federal Deposit Insurance Corporation
Area Tested	
Overall:	SATISFACTORY
Lending:	HIGH SATISFACTORY
Investment:	LOW SATISFACTORY
Service:	OUTSTANDING

Fleet Bank¹¹

Regulatory Body:	Office of the Comptroller of the Currency
Area Tested	
Overall:	SATISFACTORY
Lending:	HIGH SATISFACTORY
Investment:	OUTSTANDING
Service:	LOW SATISFACTORY

Hyde Park Cooperative Bank¹²

Regulatory Body:	Office of Thrift Supervision
Area Tested	
Overall:	SATISFACTORY

Hyde Park Savings Bank¹³

Regulatory Body:	Federal Deposit Insurance Corporation
Area Tested	
Overall:	SATISFACTORY
Lending:	LOW SATISFACTORY
Investment:	HIGH SATISFACTORY
Service:	HIGH SATISFACTORY

⁹ Ibid.¹⁰ Ibid.¹¹ Ibid.

⁶ Banks that are considered small to medium are only given one rating by the Federal Deposit Insurance Corporation as their review criteria differs from the larger banking institutions.

⁷ Based on most recent CRA Performance Evaluation by FDIC published 1999.

⁸ Ibid.

¹² Banks that are considered small to medium are only given one rating by the Federal Deposit Insurance Corporation as their review criteria differs from the larger banking institutions. Based on most recent CRA Performance Evaluation by OTS published 1999.

¹³ as of Report dated 11/9/2001; covering period 01/01/99 – 03/31/01



Liberty Bank & Trust¹⁴

Regulatory Body:	Federal Deposit Insurance Corporation
Overall:	Rating SATISFACTORY

Mellon Bank, N.A.¹⁵

Regulatory Body:	Office of the Comptroller of the Currency
Area Tested	Rating
Overall:	OUTSTANDING
Lending:	OUTSTANDING
Investment:	OUTSTANDING
Service:	HIGH SATISFACTORY

Sovereign Bank (Massachusetts)¹⁶

Regulatory Body:	Office of Thrift Supervision
Area Tested	Rating
Overall:	SATISFACTORY
Lending:	LOW SATISFACTORY
Investment:	LOW SATISFACTORY
Service:	LOW SATISFACTORY

Wainwright Bank & Trust¹⁷

Regulatory Body:	Federal Deposit Insurance Corporation
Area Tested	Rating
Overall:	OUTSTANDING
Lending:	HIGH SATISFACTORY
Investment:	OUTSTANDING
Service:	OUTSTANDING

¹⁴ Banks that are considered small to medium are only given one rating by the Federal Deposit Insurance Corporation as their review criteria differs from the larger banking institutions. Based on most recent CRA Performance Evaluation by FDIC published 1999.

¹⁵ Based on the most recent CRA Performance Evaluation review by OCC published Nov, 1997.

¹⁶ Based on most recent CRA Performance Evaluation by OTS published 2000.

¹⁷ Ibid.



Boston Bank of Commerce



Overview

Boston Bank of Commerce
133 Federal Street
Boston, MA

Description

Boston Bank of Commerce is a minority owned, commercially chartered financial institution headquartered in Boston with total assets of \$139 million. Boston Bank of Commerce maintains two branches in Boston and, because of a 1999 acquisition two more branches in Florida.

Principal Officers

CEO

Kevin Cohee
133 Federal Street
Boston, MA
617-457-4491

CFO

James Mundy
133 Federal Street
Boston, MA
617-457-4491

Chief Compliance Officer

Mary Schrader
133 Federal Street
Boston, MA
617-457-4491

Employees

Number of Employees	87
Number of Employees in Boston	30
Percentage of Women Employees	64%
Percentage of Minority Employees	88%

Branches

Number of Branches - Total	4
Branches within Boston PSMA	2
Number of ATMs	0
Number of Free Standing ATMs	0

CRA Rating

Rating Agency	FDIC
Most Recent Rating	1999
Overall Rating	SATISFACTORY ¹⁸
Lending Test Rating	SATISFACTORY
Investment Test Rating	SATISFACTORY
Service Test Rating	SATISFACTORY

¹⁸ Based on most recent CRA Performance Evaluation by FDIC published 1999.



Discussion

Overall rating: SATISFACTORY¹⁹

Lending Test

Lending Test Rating: SATISFACTORY²⁰

General Responsiveness to Credit Needs

There was a downward trend in the loan-to-deposit ratio between 1997-1999, as noted by the FDIC, in their 1999 CRA review. It was also noted that if this trend continued, or was not reversed, it could be interpreted as an indication of an overall lack of lending, which could significantly affect future CRA ratings.

This is of particular concern. The low loan-to-deposit ratio appears to support a business strategy focused on the acquisition of branches and financial institutions outside the region, using liquidity generated from Massachusetts-based deposits and assets.

In 1999, no HMDA, and no low-income mortgages were reported. In 2000, one HMDA loan was recorded, but no mortgages were recorded in Boston. The recorded mortgage was not listed as a low-income mortgage loan.

Responsiveness to Low and Moderate-Income Credit Needs

During 1999 CRA review, the Boston Bank of Commerce's (BBOC) primary lending focus was on small business and community development loans. At that time they had only originated five HMDA loans within the assessment area.

BBOC filed the following list of programs with the "Massachusetts Commissioner of Banks" for the year 2000:

BBOC organized and was the primary sponsor of "Money Matters" a financial literacy conference targeted at Black Women on April 1, 2000. This was a one-day symposium consisting of eight

separate workshops geared to the financial literacy of low and moderate-income Black women. Workshops ranged from information for first time homebuyers; to industry specialists discussing stock market investment; to the purchase of health, disability, and long term care insurance.

BBOC sponsored a financial literacy seminar held in the Roxbury Branch, targeted at small business owners seeking credit information. This seminar was a collaborative effort with the Boston Empowerment Center and "Working Capital", a CDC that specializes in providing micro loans.

BBOC participated in the City of Boston Lenders' Conference and Bidders' Fair for potential Taxi Medallion bidders.

BBOC approved a \$100,000 commitment to originate loans to applicants who have participated in the "Working Capital" CDC Program. This program has funded \$41,000 to date.

Leadership in Community Development Loans

The 1999 FDIC review listed the following as the development programs in which BBOC was involved:

- Dimock Community Health Center
- Massachusetts 54th Society
- Urban League of Massachusetts

Investment Test

Investment Test Rating: SATISFACTORY²¹

The following qualified investments were listed in the 1999 CRA report generated by the FDIC.

- Roxbury Corners Limited Partnership
- Columbia Plaza Associates

Service Test

Service Test Rating: SATISFACTORY²²

¹⁹ Based on most recent CRA Performance Evaluation by FDIC published 1999.

²⁰ Ibid.

²¹ Ibid.

²² Ibid.



Description Service Delivery Systems

BBOC is a Black-owned and managed institution. The majority of both credit and deposit services are geared to accommodate the needs of low and moderate-income individuals. Deposit products all have a low minimum balance.

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
133 Federal Street Boston, MA 02110		✓
2343 Washington Street Roxbury, MA 02119		✓

FSB: Full Service Branch

BBOC owns no proprietary ATMs, but provides service availability for cardholders at NYCE (20,000) and CIRRUS (340,000) terminals.

Special Programs

BBOC participated in the "Job Shadow Day" with the City of Boston Public Schools and the Private Industry Council.

BBOC's Chief Financial Officer participated in the National Foundation for Teaching Entrepreneurship at Charlestown High School, by judging the student business-plan competition. This program teaches youth to build businesses.

Year-Over-Year at a Glance

	1999	2000
HMDA Applications Received	0	1
HMDA Loans Originated	0	1
Low-Income Applications Received	0	0
Low-Income Loans Originated	0	0

In 1999, no HMDA, and no low-income mortgages were reported. In 2000, one HMDA loan was recorded, but no mortgages were recorded in Boston. The recorded mortgage was not listed as a low-income mortgage loan.



Source Documents

Community Reinvestment Evaluation, Federal Deposit Insurance Corporation; November 15, 1999.

FFIEC HMDA Aggregate & Disclosure Software Version 2.0, Board of the Governors of the Federal Reserve System; 2000.

1999 Linked Deposit Report to the Mayor of the City of Boston, NobleAssociates; June 2000.

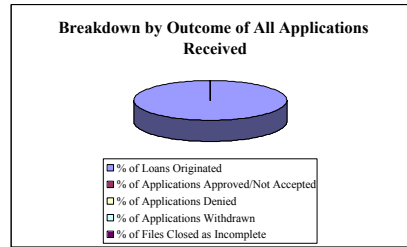
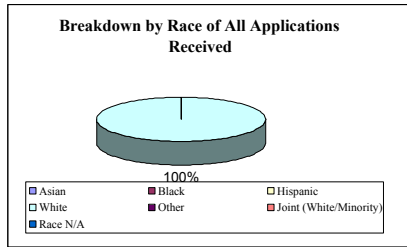
Boston Bank of Commerce website.

BBOC Lending Information - HMDA

2000

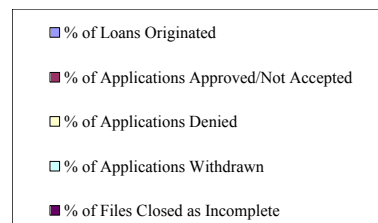
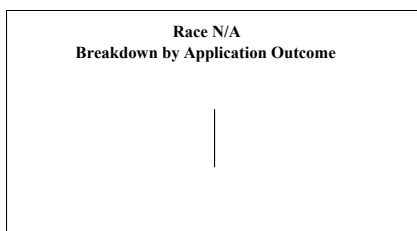
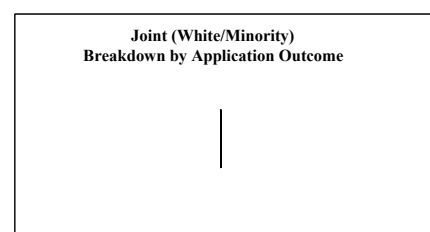
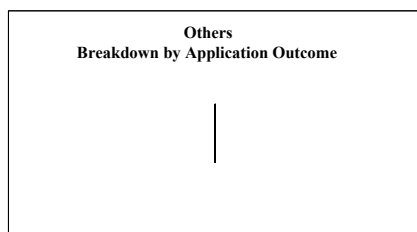
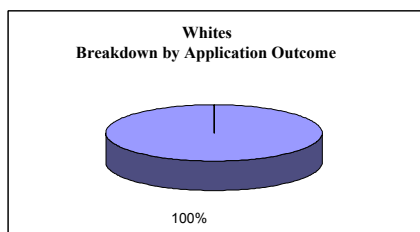
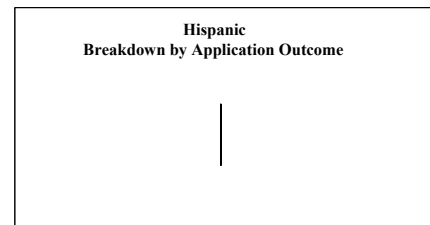
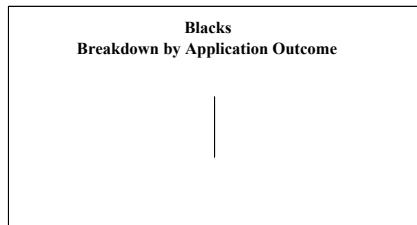
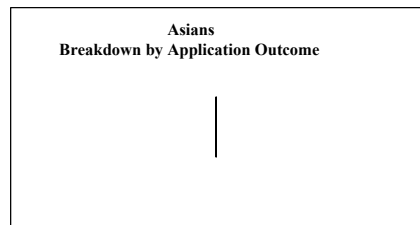
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Hispanic	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	1	100%	1	100%	0	0%	0	0%	0	0%	0	0%
Other	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	1	100%	1	100%	0	0%	0	0%	0	0%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

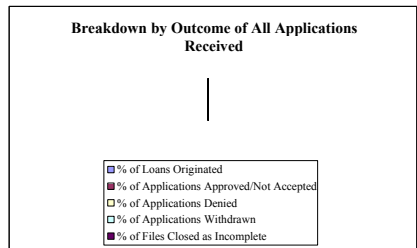
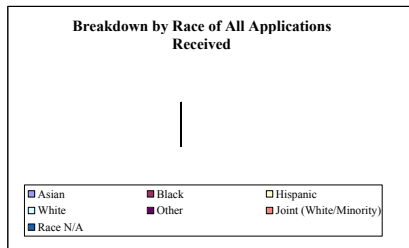


BBOC Low-Income Mortgage Lending

2000

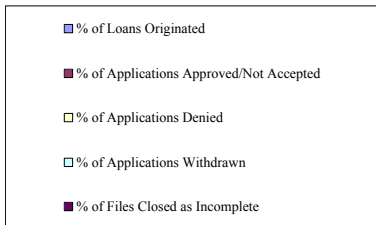
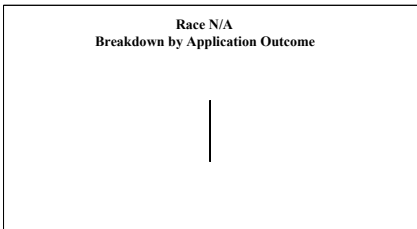
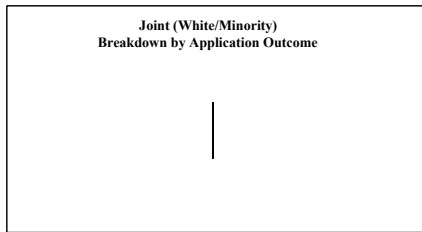
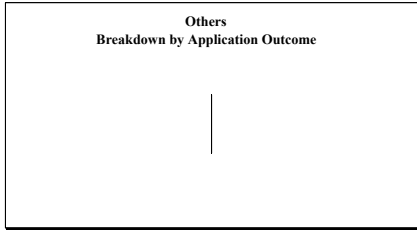
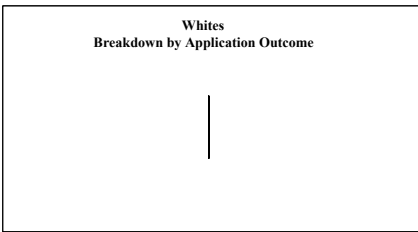
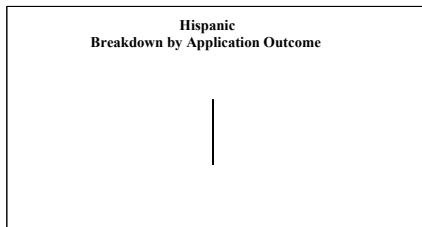
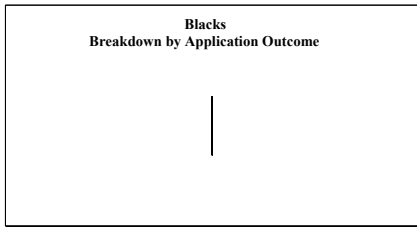
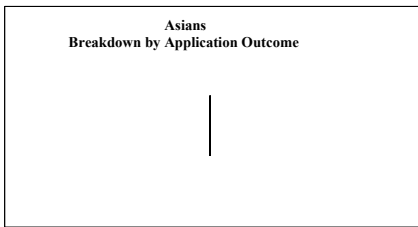
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Hispanic	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Other	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%

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The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.





Employment Information

No data available

Boston Bank of Commerce Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																		
Home Purchase Loans												Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D & E			
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans			E						
A			B			C			D									
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	
MSA TOTAL																		
LOAN ORIGINATED			1	100%	226	1	100%	570	1	100%	45				1	100%	226	
APPROVED, NOT ACCEPTED																		
APP DENIED																		
APP WITHDRAWN																		
FILES CLOSED FOR INCOMPLETENESS																		
MA/SUFFOLK/0707.00																		
LOAN ORIGINATED			1	100%	226											1		226
APPROVED, NOT ACCEPTED																		
APP DENIED																		
APP WITHDRAWN																		
FILES CLOSED FOR INCOMPLETENESS																		
MA/SUFFOLK/0902.00																		
LOAN ORIGINATED													1	100%	45			
APPROVED, NOT ACCEPTED																		
APP DENIED																		
APP WITHDRAWN																		
FILES CLOSED FOR INCOMPLETENESS																		
MA/SUFFOLK/1011.02																		
LOAN ORIGINATED																		
APPROVED, NOT ACCEPTED																		
APP DENIED																		
APP WITHDRAWN																		
FILES CLOSED FOR INCOMPLETENESS																		

Boston Bank of Commerce Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1201.00

LOAN ORIGINATED	1	100%	570
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			



Boston Private Bank



BOSTON PRIVATE BANK & TRUST COMPANY

Overview

Boston Private Bank & Trust Company
10 Post Office Square
Boston, MA

Description

Boston Private Bank is a subsidiary of Boston Private Financial Holdings, a publicly traded company founded in 1987. Boston Private Bank & Trust Company specializes in providing private banking and investment services to individuals, their families and businesses. Boston Private Bank & Trust company also offers First Time Homebuyer Programs and affordable "soft-second" mortgage financing. Under its Accessible Banking Program, the Bank is an active provider of real estate financing for affordable housing, economic development and small business.¹

Principal Officers

CEO

Timothy Valli
10 Post Office Square
Boston, MA
617-556-1900

CFO

Anne Randall
10 Post Office Square
Boston, MA
617-556-1900

Chief Compliance Officer

Ester Schloroltz
10 Post Office Square
Boston, MA
617-556-1900

Employees

Number of Employees	190
Number of Employees in Massachusetts	190
Percentage of Women Employees	43%
Percentage of Minority Employees	16%

Branches

Number of Branches - Total	2
Branches within Boston PSMA	2
Number of ATMs	0
Number of Free Standing ATMs	0

CRA Rating

Rating Agency	FDIC
Most Recent Rating	2000
Overall Rating	SATISFACTORY ²
Lending Test Rating	HIGH
	SATISFACTORY
Investment Test Rating	HIGH
	SATISFACTORY
Service Test Rating	HIGH
	SATISFACTORY

¹ Boston Private Bank website.

²Based on most recent CRA Performance Evaluation by FDIC published 2000.



Discussion

Overall rating: SATISFACTORY²⁵

Lending Test

Lending Test Rating: HIGH SATISFACTORY²⁶

General Responsiveness to Credit Needs

Boston Private Bank's specialty is fostering full-service banking relationships. Its niche is building relationships, especially with affluent individuals and families. The bank has been able to meet CRA obligations through ongoing involvement with several community groups. They have participated in numerous community development projects, community homeowner programs and other types of community investment services.

The total amount of loans is \$420 million.

Boston Private Bank is an active lender in the HMDA and small business lending categories. Boston Private Bank originated 298 HMDA reportable loans totaling \$113,224 million. There were 88 small business loans, totaling \$19,689 million.

Boston Private Bank has worked closely with the Massachusetts Affordable Housing Alliance and Fannie Mae to develop a secondary market source for loans originated through the Boston Soft Second Program. Consequently, in 1999, they sold \$4 million in loans originated through the Boston Soft-Second Program. Boston Private continues to service these loans, thereby maintaining a relationship with the borrower.

Responsiveness to Low and Moderate-Income Credit Needs

There are 201 census tracts in the Boston Private Bank assessment area. Boston Private Bank originated HMDA loans in 75 of these 201 census tracts. In the following census tract categories they generated loans as follows:

Low	15.8%
Moderate	46.1%
Middle	26.7%
Upper	52.4%

Boston Private Bank generated almost one-half of their loans within the low to moderate census tracts for 1999.

The average dollar level of the HMDA loans generated by the bank in the upper-income census tracts is much higher (\$623,000).

HMDA lending by dollar volume is below the aggregate, it is significantly higher by number of loans. The number of HMDA loans, as a percentage of total HMDA loans, however, can be somewhat misleading; the nature of the institution is as a niche, private banking organization and is not necessarily reflective of where the Boston Private Bank's resources are going.

Boston Private Bank offers numerous residential lending products, specifically to promote home ownership for low and moderate-income borrowers:

- **Community Homeowner I Program** for low-income borrowers. Boston Private Bank participates in this program with the Commonwealth of Massachusetts, the City of Boston, and the Federal Home Loan Bank. Borrowers must earn less than 50% of the median family income to be eligible. The borrowers are offered 50 basis points below the standard 2 points, and a 30 year fixed rate mortgage. The program offers a 30 year fixed rate with no point, reduced closing costs, and flexible underwriting terms. During 1998 and year-to-date 1999, Boston Private Bank originated 128 mortgages, including soft second mortgages, totaling \$7,141,206.
- **Community Homeowner II Program.** Participation in this program is offered by the Neighborhood of Affordable Housing, and the Neighborhood Housing Services of America in conjunction with the City of Boston. This program offers generally-below-market, fixed interest rates for terms of up to 30 years. Although the maximum

²⁵ Based on most recent CRA Performance Evaluation by FDIC published 2000.

²⁶ Ibid.



loan-to-value is 80%, borrowers can also obtain a simultaneous second mortgage for up to 120% of the loan-to-value, from one of the aforementioned housing agencies. Eight mortgages were originated through this program during this period totaling \$847,000.

- **Community Homeowner III Program:** This program was developed in-house for first-time homebuyers. Boston Private offers generally-below-market interest rates for a term of 30 years and very flexible underwriting standards. Some borrowers receive closing cost assistance from the City of Boston. The bank has originated 34 loans totaling \$3,984,460.
- **City of Boston Homeworks:** Eligible borrowers must earn less than 100% of the median family income. Through this program, the borrowers receive home improvement loans at below market, fixed interest rates for 1-15 years. The City of Boston matches the home improvement loan funds received from the institution.

Boston Private Bank's level of small business lending within the low and moderate-income census tracts is somewhat mitigated when compared to the aggregate. This is due to the location of its two branches in relation to the size of its assessment area, and the location of the low and moderate-income tracts.

	Aggregate Lending 1998:	YTD 1999
Low	24.1%	3.4%
Moderate	17.7%	12.4%
Middle	15.1%	6.1%
Upper	43.1%	78.1%

Boston Private Bank's level of small business lending in low and moderate-income census tracts is below the aggregate for 1998. It should be noted that Boston Private Bank is a relatively small bank in comparison to some larger regional institutions located in the metropolitan area. These larger banks have a much stronger branch network within the city of Boston compared to Boston Private's one downtown branch. Given the level of competition and the aforementioned mitigating factors, Boston Private's geographic distribution of loans is considered adequate.

The majority of small business loans were originated to businesses with gross annual revenues of \$1,000,000 or less.

Leadership in Community Development Loans

Boston Private Bank's level of community development lending is considered excellent.

Boston Private Bank's level of community lending is considered excellent. In total, the bank originated 21 community development loans totaling \$13,061,477 during the review period.

The following information highlights some of Boston Private Bank's more noteworthy qualified community development loans:

- A loan of \$1,938,546 to a non-profit organization to construct 36 units of low-income housing in Roxbury.
- A loan for \$305,000 to a non-profit housing organization to renovate deteriorated properties for sale to moderate-income, first time homebuyers.
- A loan for \$700,000 to a non-profit housing organization to construct 27 units of rental housing for very low-income grandparents assuming direct responsibility for raising their grandchildren.
- A loan for \$250,000 to a non-profit housing organization to renovate properties seized by the City of Boston. These properties are being renovated for rental to low and moderate-income families.
- A loan for \$696,000 to a non-profit housing organization to construct nine units of affordable housing in the Blue Hill Avenue section of Boston.
- A \$450,000 loan to a non-profit organization that provides home health care to Medicare recipients.
- A \$1,100,000 line of credit for a non-profit organization that provides daily and residential services for mentally retarded individuals.
- A \$250,000 line of credit for a non-profit organization that serves homeless youths.



Investment Test

Investment Test Rating: HIGH SATISFACTORY²⁷

Boston Private Bank has made a variety of qualified investments, generally through the provision of direct equity investments grants. Many of Boston Private Bank's investments are directed at Boston's inner-city neighborhoods, low and moderate-income, or minority areas. Boston Private Bank is involved in the Massachusetts Housing Equity Fund (MHEF), which provides affordable housing in Boston. The bank also has a corporate giving plan that grants funds to various community organizations identified through the Boston Private Bank's community outreach efforts.

The institution has granted \$2,656,156 to 97 qualified organizations.

Boston Private Bank's qualified investments are:

- The Massachusetts Housing Investment Corporation (MHIC) - a non-profit corporation that works to expand financing of affordable housing in low and moderate-income communities in the state.
- The Boston Community Capital/Loan Fund (BCLF) Venture Fund - an affiliate of Boston Community Capital. It was established as a non-profit organization in 1985 to lend funds, on a secured basis, to community organizations for building community development projects in low-income communities. During 1999, the bank converted its \$100,000 subordinated low-interest loan to an equity equivalent investment.

During this evaluation period, Boston Private Bank provided grants to 97 qualified organizations, totaling \$108,720 for community development.

- Citizens' Housing and Planning Association - a non-profit umbrella organization for affordable housing and community development activities in Massachusetts. The grant they received was in support of Homepath Collaborative project; a comprehensive training and technical

assistance program for non-profit homebuyer counseling agencies.

- The Massachusetts Association of Community Organizations for Reform Now (ACORN) - a grassroots organization of low and moderate-income families who have come together to improve their communities.
- The Massachusetts Association of Community Development Corporations (MACCDC) - established as a trade association in 1980 to advance the work of non-profit community development corporations (CDCs).
- The Women's Institute for Housing and Economic Development Organization - creates affordable housing and economic opportunities for low-income women and their families.
- The Urban Edge Housing Corporation - is a non-profit developer that has developed housing to sell or rent to low and moderate-income families in Jamaica Plain and Roxbury.
- The Veterans Benefits Clearinghouse (VBC) - provides broad, holistic support for Boston area minority veterans of all wars with specific focus on the Vietnam era. VBC provides job counseling, medical services, veterans' benefits referral and housing counseling to Boston area minority war veterans.

Service Test

Service Test Rating: HIGH SATISFACTORY²⁸

Description Service Delivery Systems

Boston Private Bank has a limited network, consisting of 2 branches. Boston Private Bank customers have access to over 900 ATMs in the bank's assessment area and through a correspondent relationship with Fleet Bank for all deposits and withdrawals. The fee for these services is \$1.00 per transaction. The bank also offers: banking by mail, via computer, international banking and bilingual employees.

Branch Information

Boston Private Bank has a formal Branch Opening and Branch Closing Policy. In April

²⁷ Based on most recent CRA Performance Evaluation by FDIC published 2000.

²⁸ Ibid.



1998, the bank opened a new office located at 336 Washington Street Wellesley. The bank has also applied to open another branch on Boylston Street in Boston.

Special Programs

Boston Private Bank expends considerable resources on making applications to the Federal Home Loan Bank of Boston Affordable Housing Program on behalf of various community development organizations. This is a highly competitive funding program in which member banks, such as Boston Private, are eligible to compete for grant money earmarked for selected, non-profit organizations. Boston Private Bank regularly applies for the maximum amount available, and is often awarded up to four grants. In 1998 and 1999, the bank was awarded 8 grants totaling \$1,780,000 for several area non-profit organizations, resulting in the creation, or preservation, of 542 affordable housing units.

Additional Information

Boston Private Bank's trustees, officers and employees, at all levels, are actively involved with community organizations.

Boston Private Bank made a \$300,000 loan to the Massachusetts Housing Investment Corporation (MHIC) loan pool. The bank's CRA officer is a member of the MHIC loan committee.

Boston Private Bank invested \$25,000 in the Urban Edge/CDC Tax Equity Credit Program, which is an innovative development pool sponsored by the Urban Edge, and eight other non-profit community development corporations.

Boston Private Bank's president and chief executive officer (CEO) serves on the Board of Directors and has served as treasurer of the Ten Point Coalition. The Ten Point Coalition is a group of 50 churches mobilized to address issues germane to Boston's Black youth, and community revitalization concerns.

The CRA officer is a member of the Board of Directors of the Massachusetts Community Banking Council (MCBC) Affordable Housing Committee.

The CRA officer and the mortgage loan officer are members of the Latino Homebuyer Subcommittee, which seeks to identify and overcome barriers to homeownership for this population.

The CRA officer is a member of the Board of Directors of the Metropolitan Boston Housing Partnership (MBHP) whose mission is to create and preserve affordable housing and economic opportunity for low-income people.

The bank was a sponsor of, and participated in, the City of Boston's Small Business Expo in 1997, 1998 and 1999.

Year-Over-Year at a Glance

Data for Boston Private Bank was not reported in the City of Boston 1999 Linked Deposit Banking Report to the Mayor.



Source Documents

Annual CRA Report to the Massachusetts
Commissioner of Banks, Commonwealth of
Massachusetts, January 12, 2000.

FFIEC HMDA Aggregate & Disclosure
Software Version 2.0, Board of the Governors of
the Federal Reserve System, 2000.

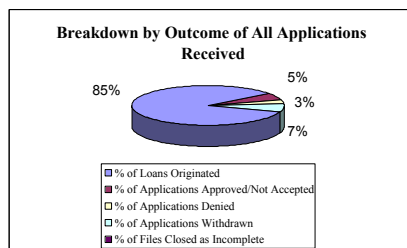
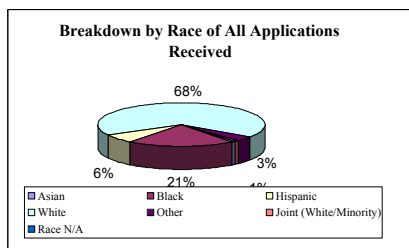
Boston Private Bank website
<http://www.bostonprivatebank.com/>

Boston Private Bank Lending Information - HMDA

2000

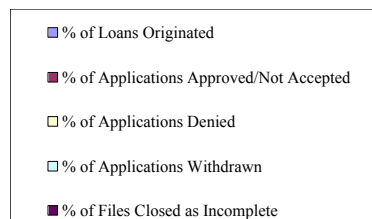
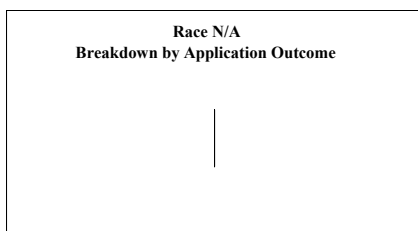
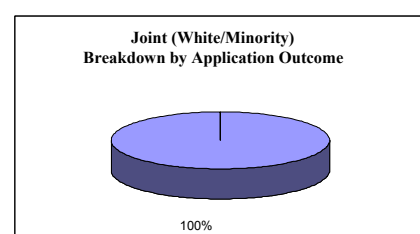
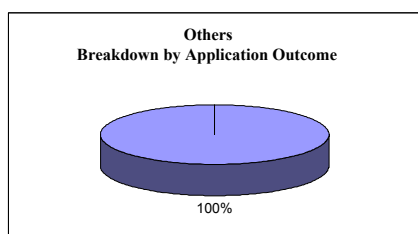
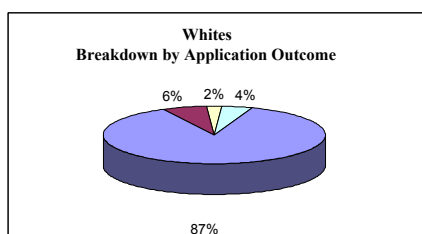
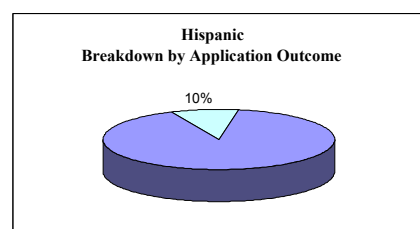
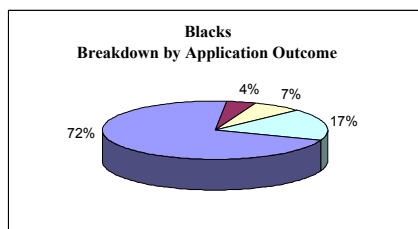
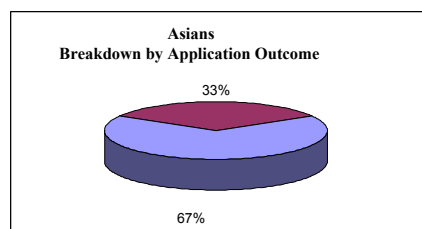
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	3	1%	2	67%	1	33%	0	0%	0	0%	0	0%
Black	69	21%	49	71%	3	4%	5	7%	12	17%	0	0%
Hispanic	21	6%	19	90%	0	0%	0	0%	2	10%	0	0%
White	224	68%	195	87%	14	6%	5	2%	10	4%	0	0%
Other	11	3%	11	100%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	3	1%	3	100%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	331	100%	279	84%	18	5%	10	3%	24	7%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

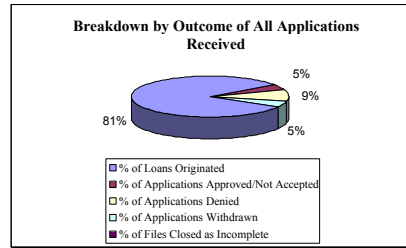
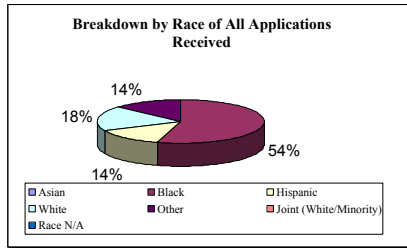


Boston Private Bank Low-Income Mortgage Lending

2000

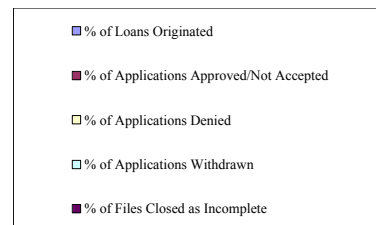
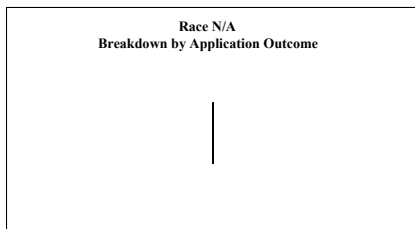
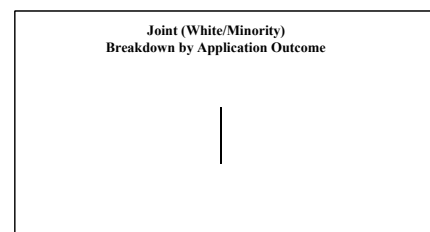
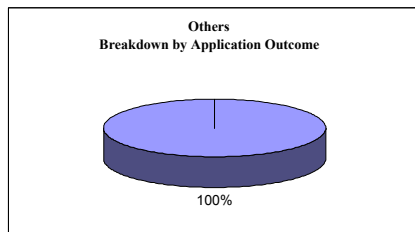
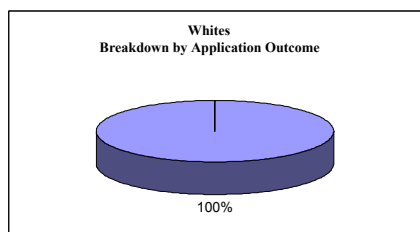
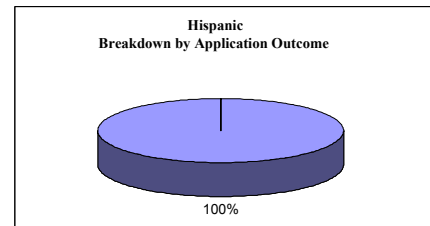
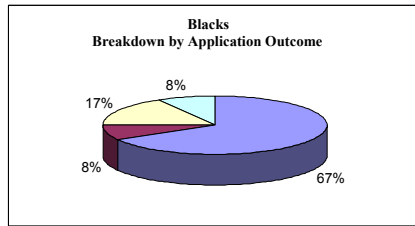
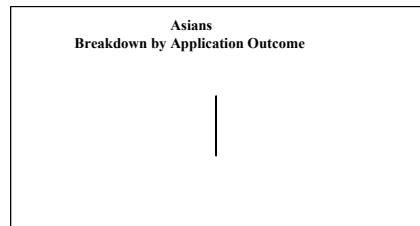
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black	24	55%	16	67%	2	8%	4	17%	2	8%	0	0%
Hispanic	6	14%	6	100%	0	0%	0	0%	0	0%	0	0%
White	8	18%	8	100%	0	0%	0	0%	0	0%	0	0%
Other	6	14%	6	100%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	44	100%	36	82%	2	5%	4	9%	2	5%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.



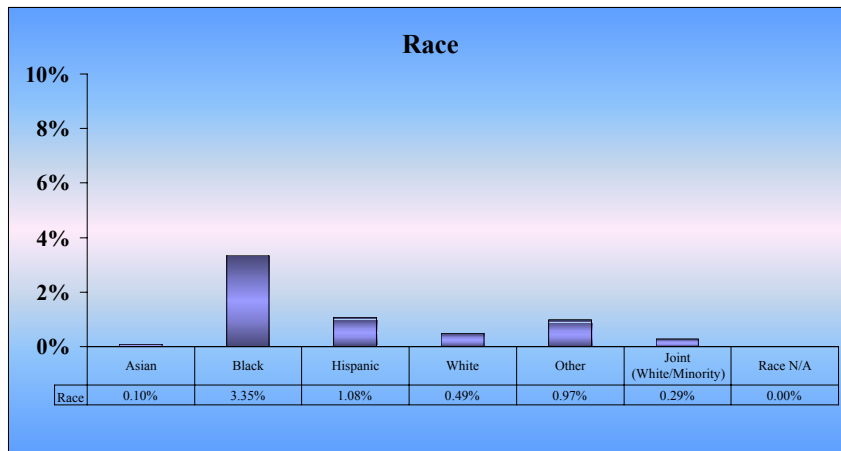
Compared against the MSA Aggregate Total

2000

Boston Private Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Asian	3	0.10%	2	0.09%	1	0.45%	0	0.00%	0	0.00%	0	0.00%
Black	69	3.35%	49	3.96%	3	1.89%	5	1.13%	12	7.59%	0	0.00%
Hispanic	21	1.08%	19	1.46%	0	0.00%	0	0.00%	2	1.30%	0	0.00%
White	224	0.49%	195	0.54%	14	0.42%	5	0.14%	10	0.39%	0	0.00%
Other	11	0.97%	11	1.43%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	3	0.29%	3	0.36%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	331	0.53%	279	0.59%	18	0.37%	10	0.17%	24	0.58%	0	0.00%

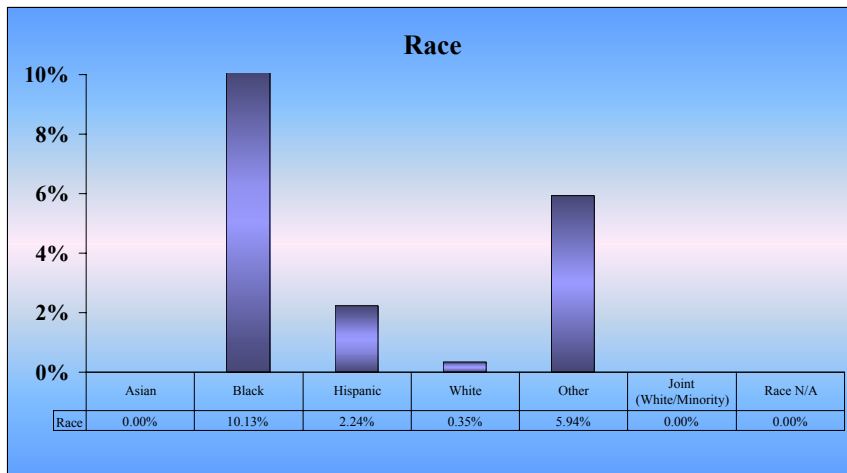
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Boston Private Bank Low-Income Mortgage Information

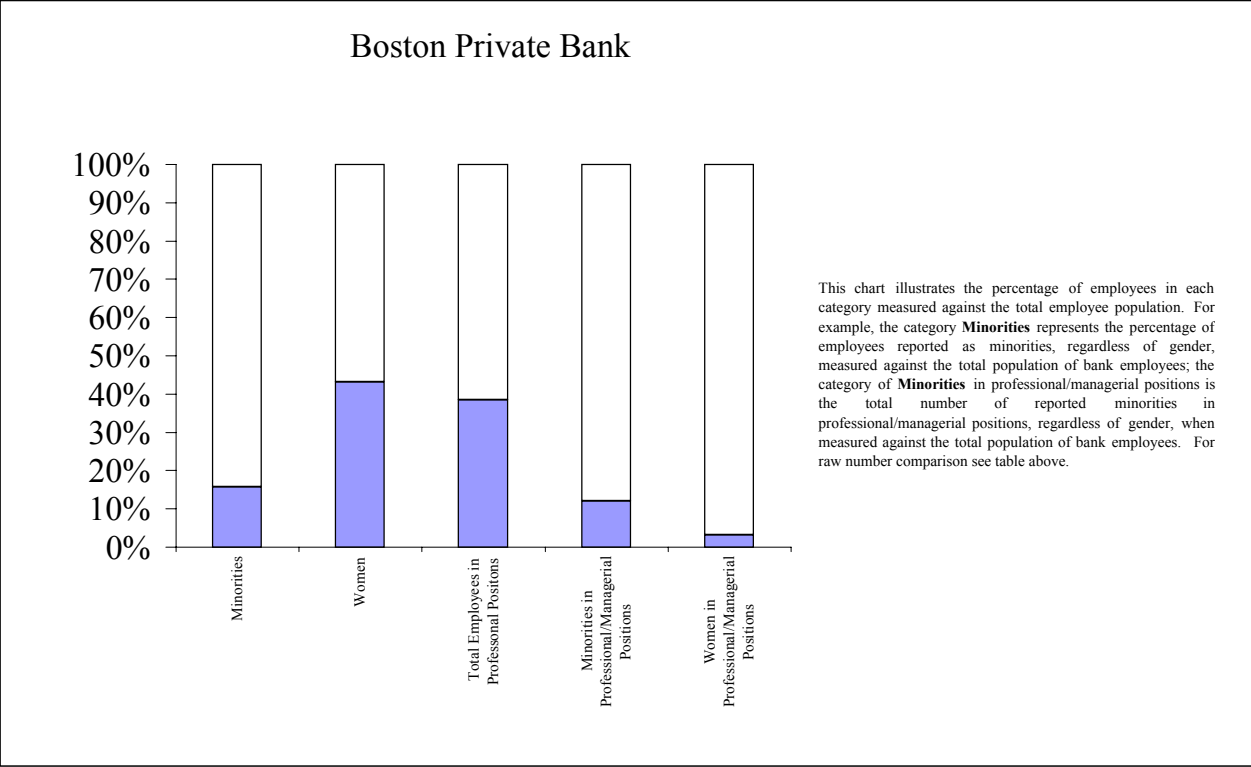
Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Asian	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Black	24	10.13%	16	11.94%	2	14.29%	4	7.55%	2	9.52%	0	0.00%
Hispanic	6	2.24%	6	3.35%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
White	8	0.35%	8	0.50%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other	6	5.94%	6	9.38%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	44	1.25%	36	1.59%	2	0.89%	4	0.61%	2	0.63%	0	0.00%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Boston Private Bank Employment Numbers

	Number of Employees	Percent of Total Employees
Total	190	
Minorities	30	16%
Women	82	43%
Total Employees In Professional Positions	73	38%
Minorities in Professional or Managerial Positions	23	12%
Women in Professional or Managerial Positions	6	3%



Boston Private Bank

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																				
Home Purchase Loans															Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans											
A			B			C			D			E			& E					
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's			
			155	83%	35616	14	78%	9506	2	40%	81	4	100%	4891	5	63%	2328			
			7	4%	1837	1	6%	250							1	13%	100			
			5	3%	492	3	17%	1019	1	20%	15				1	13%	410			
			20	11%	7274				2	40%	35				1	13%	240			

MA/SUFFOLK/0002.01

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED				
APP WITHDRAWN	1	100%	10	
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/0005.02

LOAN ORIGINATED	3	100%	404
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0106.00

LOAN ORIGINATED	4	80%	3922
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN	1	20%	1103
FILES CLOSED FOR INCOMPLETENESS			

Boston Private Bank

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																				
Home Purchase Loans															Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans											
A			B			C			D			E			& E					
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's			
			7	100%	4453	1	33%	632							1	50%	188			
						2	67%	910							1	50%	410			
			10	91%	7636	1	50%	636												
			1	9%	606	1	50%	250												
			6	86%	3282	3	100%	1740							1	100%	272			
			1	14%	1000															
			1	50%	100															
			1	50%	100							1	100%	100						

Boston Private Bank

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0203.00

LOAN ORIGINATED	3	100%	2500	1	100%	1000
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0302.00

LOAN ORIGINATED	1	100%	1950
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0303.00

LOAN ORIGINATED	1	100%	333	1	100%	543
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0304.00

LOAN ORIGINATED	1	100%	740
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Boston Private Bank

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0404.00

LOAN ORIGINATED	1	100%	318
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0501.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED				
APP WITHDRAWN	1	100%	134	
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/0505.00

LOAN ORIGINATED	2	100%	90
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0506.00

LOAN ORIGINATED	1	100%	131
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Boston Private Bank

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0509.00

LOAN ORIGINATED	2	100%	195
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0512.00

LOAN ORIGINATED	4	100%	133
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0605.00

LOAN ORIGINATED	1	100%	191
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0606.00

LOAN ORIGINATED	4	100%	257
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Boston Private Bank

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0608.00

LOAN ORIGINATED	1	100%	576
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0701.00

LOAN ORIGINATED	2	67%	868	2	100%	2860	2	100%	868
APPROVED, NOT ACCEPTED	1	33%	380						
APP DENIED									
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/0703.00

LOAN ORIGINATED	1	100%	1000
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN	2	100%	3400
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0705.00

LOAN ORIGINATED	2	100%	1075	1	100%	1500
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Boston Private Bank

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0708.00

LOAN ORIGINATED	3	100%	855
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0709.00

LOAN ORIGINATED	4	100%	232
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0710.00

LOAN ORIGINATED	2	100%	108
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0712.00

LOAN ORIGINATED	1	100%	800
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Boston Private Bank

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0805.00

LOAN ORIGINATED	10	83%	474
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN	2	17%	81
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0810.00

LOAN ORIGINATED	1	100%	300
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0811.00

LOAN ORIGINATED	2	100%	65
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0814.00

LOAN ORIGINATED	1	100%	1250
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Boston Private Bank

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0817.00

LOAN ORIGINATED	2	100%	132
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0901.00

LOAN ORIGINATED	2	50%	158
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN	2	50%	219
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0902.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	2	100%	95	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/0904.00

LOAN ORIGINATED	2	100%	105
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Boston Private Bank

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0905.00

LOAN ORIGINATED	10	100%	506
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0906.00

LOAN ORIGINATED	2	100%	181
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0909.00

LOAN ORIGINATED	2	100%	92
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0910.00

LOAN ORIGINATED	2	100%	115
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Boston Private Bank

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0913.00

LOAN ORIGINATED	2	100%	480
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0914.00

LOAN ORIGINATED	1	100%	85
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0915.00

LOAN ORIGINATED	2	50%	81
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN	2	50%	166
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0917.00

LOAN ORIGINATED	2	100%	212
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Boston Private Bank

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans			Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
												E			& E		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's
			1	33%	267												
			1	33%	228												
			1	33%	245												
			2	50%	119												
			2	50%	184												
			10	100%	484												
			2	67%	114												
			1	33%	278												

Boston Private Bank

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0923.00

LOAN ORIGINATED	2	100%	166
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1001.00

LOAN ORIGINATED	2	100%	171
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1004.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED	2	100%	187	
APP DENIED				
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/1005.00

LOAN ORIGINATED	2	50%	175	1	100%	31
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN	2	50%	190			
FILES CLOSED FOR INCOMPLETENESS						

Boston Private Bank

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1008.00

LOAN ORIGINATED	4	100%	266
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1009.00

LOAN ORIGINATED	1	100%	50
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1010.01

LOAN ORIGINATED	4	100%	295
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1011.01

LOAN ORIGINATED	2	100%	154
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Boston Private Bank

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																				
Home Purchase Loans															Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans											
A			B			C			D			E			& E					
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's			
			2	100%	128															
			2	100%	67															
			2	100%	118															
			1	100%	240															

Boston Private Bank

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1106.01

LOAN ORIGINATED	1	100%	312
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1201.00

LOAN ORIGINATED	2	67%	529			
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN	1	33%	245	1	100%	25
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1204.00

LOAN ORIGINATED	2	67%	110
APPROVED, NOT ACCEPTED	1	33%	336
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1207.00

LOAN ORIGINATED	2	100%	94
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Boston Private Bank

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1302.00

LOAN ORIGINATED	3	100%	163
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1303.00

LOAN ORIGINATED	1	100%	89
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1401.01

LOAN ORIGINATED	2	100%	128
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1401.02

LOAN ORIGINATED	1	100%	171
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Boston Private Bank Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1403.00

LOAN ORIGINATED							
APPROVED, NOT ACCEPTED							
APP DENIED	1	100%	109	1	100%	15	
APP WITHDRAWN							
FILES CLOSED FOR INCOMPLETENESS							

MA/SUFFOLK/1404.00

LOAN ORIGINATED	3	100%	325
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1603.00

LOAN ORIGINATED	1	100%	228
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/WORCESTER/7411.98

LOAN ORIGINATED	1	100%	775	1	100%	455
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						



Century Bank & Trust



Century Bank
Banking for the New Century

Overview

Century Bank & Trust
400 Mystic Avenue
Medford, MA

Description

Century Bank and Trust is a one billion dollar community-focused, commercial bank, located in Medford, Massachusetts. The bank is a subsidiary of Century Bancorp, Inc. Century Bank's primary focus is the origination of commercial and commercial real estate loans, with particular emphasis on small to medium-size business lending.

Principal Officers

CEO

Marshall Sloan
400 Mystic Avenue
Medford, MA
781-391-4000

CFO

Paul Cusik
400 Mystic Avenue
Medford, MA
7181-391-4000

Compliance Officer

Janet McElwee
400 Mystic Avenue
Medford, MA
781-391-4000

Employees

Number of Employees	339
Number of Employees in Massachusetts	339
Percentage of Women Employees	67%
Percentage of Minority Employees	1.5%

Branches

Number of Branches - Total	16
Branches within Boston PSMA	2
Number of ATMs	17
Number of Free Standing ATMs	1

CRA Rating

Rating Agency	FDIC
Most Recent Rating	1999
Overall Rating	SATISFACTORY ²⁹
Lending Test Rating	HIGH SATISFACTORY
Investment Test Rating	HIGH SATISFACTORY
Service Test Rating	HIGH SATISFACTORY

²⁹Based on most recent CRA Performance Evaluation by FDIC published 1999.



Discussion

Overall rating: SATISFACTORY³⁰

Lending Test

Lending Test Rating: HIGH SATISFACTORY³¹

General Responsiveness to Credit Needs

During the 1999 review it was noted that the residential lending activity of Century Bank & Trust had significantly declined during the period 1997 to 1998. This trend continued into 1999. HMDA reportable loans dropped from 121 in 1997 to 30 in 1999. The management of Century Bank & Trust attributed this decline to a change in marketing focus and increased competition.

Responsiveness to Low and Moderate-Income Credit Needs

During the 1999 review it was noted that there was a less than favorable relationship that existed when low-income originations were compared to low-income households in the area. However, within the moderate-income tracts, the banks lending level increased over the previous two years.

Century Bank & Trust participates in or has mortgage programs for homebuyers in the low and moderate-income brackets (see Appendix A).

Leadership in Community Development Loans

The following is a listing of the Community/Economic Loans generated by Century Bank & Trust in the year 2000.

- EDIC (Lynn Community sponsored by the City of Lynn, Massachusetts). Non-profit Small Business Economic Development. Amount \$2,741,000
- Oakland Park Children's Center, Inc. (Sponsored by the Department of Social Services, DSS) Medford, Massachusetts. Non-profit childcare located in the First

Baptist Church in Medford. This organization receives support from the DSS. These funds were for the renovation of the center. Amount \$20,000

- First Church of Malden. Non-profit religious organization located in low and moderate income census tracts. Funds were for the updating of the church's heating system. Amount \$36,104
- Twenty P Realty Trust, Boston, Massachusetts. Development loan for mixed-use retail/apartment building in low and moderate-income area. Permit requires that 25% of apartments be rented as affordable housing. Amount \$3,245,000
- Societa Festa San Guiseppe, Boston, Massachusetts. Non-profit organization whose primary function is assisting local immigrant population in providing education and religious support. Society and its beneficiaries based in low and moderate-income areas. Amount \$60,000
- 3 Mechanic Street Real Estate, Boston, Massachusetts. Refinance and renovation of 11-unit apartment building in a low and moderate-income area. Amount \$300,000
- Nedia Trust, Boston, Massachusetts. Renovation of mixed-use retail/apartment building in low and moderate-income area. Amount \$60,000
- Ernani Capone, Boston, Massachusetts. Acquisition and renovation of apartment building in a low and moderate-income area. Amount \$400,000
- Wakeby Realty Trust, Boston, Massachusetts. Renovation of apartment building in low and moderate-income area. Amount \$50,156
- Douglas A King Builders, Inc., Easton, Massachusetts. Development of town owned property (former school) into age restricted (55 and over) apartments located in low and moderate-income area. Amount \$2,000,000

Investment Test

Investment Test Rating: HIGH SATISFACTORY³²

Century Bank & Trust made several qualified investments in 2000 (see Appendix B).

³⁰ Based on most recent CRA Performance Evaluation by FDIC published 1999.

³¹ Ibid.

³² Ibid.



Service Test

Service Test Rating: HIGH SATISFACTORY³³

Description Service Delivery Systems

At the end of the year 2000, Century bank employed 350 people, operated 17 branches and 14 ATMs. Approximately half of these branches were located in low to moderate-income census tracts.

Bilingual employees are available at every branch to serve the community members (more than 13 different languages). English/Spanish ATMs are also available.

Century Bank provides personalized sales and service during banking hours through their Telebanking Center and provides information about various banking services on their website, www.century-bank.com. Their Internet banking services including on-line bill payment services known as "Express Pay".

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
275 Hanover Street Boston, MA 02113		✓
280 Atlantic Avenue Boston, MA 02110	✓	✓

FSB: Full Service Branch

Year-Over-Year at a Glance

	1999	2000
HMDA Applications Received	50	57
HMDA Loans Originated	36	52
Low-Income Applications Received	1	1
Low-Income Loans Originated	1	1

HMDA reportable applications received increased from 50 to 57 year-over-year, 1999 to 2000. Loans originated from this pool increased from 72% to 91%. Century Bank reported one low income loan in both years.

³³ Ibid.



Century Bank & Trust Appendix A

Mortgage Programs For Homebuyers In The Low And Moderate-Income Brackets

Program	Eligibility
First-Time Home Buyers Program	First Time homebuyer
First & Second Home Buyers Program City of Malden	First Time homebuyer in Malden, MA
First Mortgages	80% LTV non-conforming 1-4 family dwelling
Residential Financing	Varied
Home Equity Credit Line	Owner occupied property LTV: 75% On 1 or 2 Family & Second homes, 70 % on 3 or 4 Family, 75% on Condo's
Home Equity Loan	Owner occupied property LTV: 75% On 1 or 2 Family & Second homes, 70% on 3 or 4 Family Homes, 75% on Condo's



Century Bank & Trust Appendix B

2000 Qualified Investments

Name	Description	Beneficiary	Type	Amount
Access Capital Strategies Corp	Affordable Housing	Low-Mod Fund	Investment share value as of 11/30/2000	\$98,380.29
Florida International University	Scholarship income individual	Low-Mod	Grant	\$750
Catholic Charities Inner City Scholarship Fund	Scholarship(s) Low-Mod Income Individuals	Various	Grant	\$5000



Source Documents

Community Reinvestment Act Performance
Evaluation, Federal Deposit Insurance
Corporation, June 21, 1999.

Annual CRA Report to the Commissioner of
Banks, Commonwealth of Massachusetts, 2000.

FFIEC HMDA Aggregate & Disclosure
Software Version 2.0, Board of the Governors of
the Federal Reserve System, 2000.

1999 Linked Deposit Report to the Mayor of the
City of Boston, NobleAssociates, June 2000.

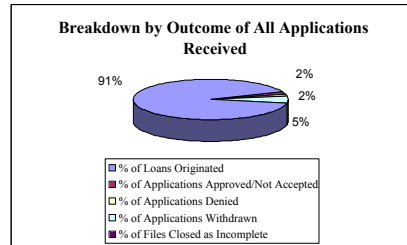
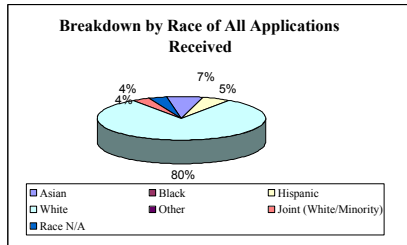
Century Bank website
<http://www.century-bank.com/>

Century Bank Lending Information - HMDA

2000

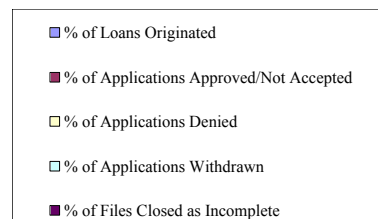
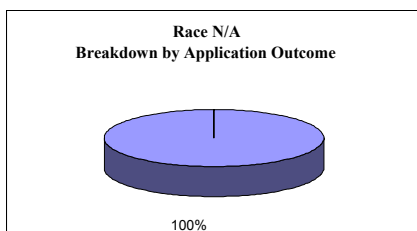
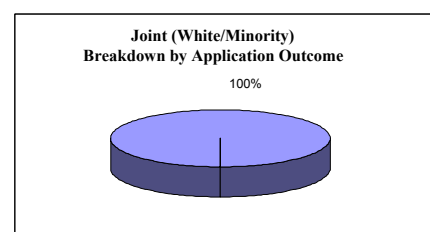
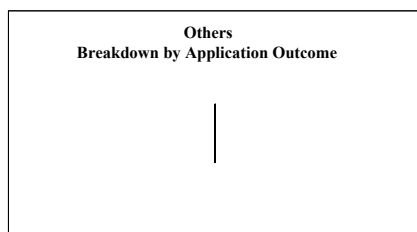
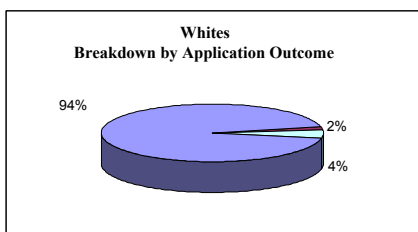
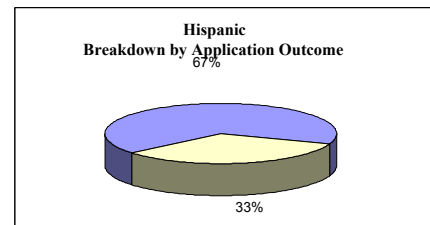
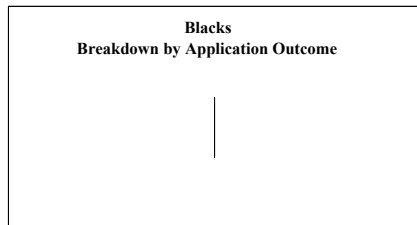
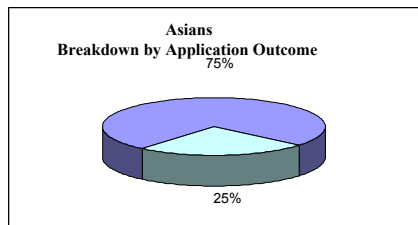
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	4	7%	3	75%	0	0%	0	0%	1	25%	0	0%
Black	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Hispanic	3	5%	2	67%	0	0%	1	33%	0	0%	0	0%
White	46	81%	43	93%	1	2%	0	0%	2	4%	0	0%
Other	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	2	4%	2	100%	0	0%	0	0%	0	0%	0	0%
Race N/A	2	4%	2	100%	0	0%	0	0%	0	0%	0	0%
Total	57	100%	52	91%	1	2%	1	2%	3	5%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

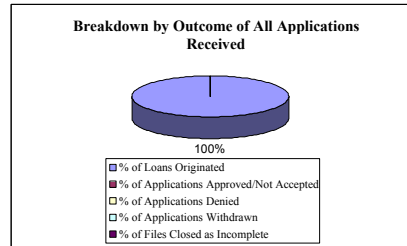
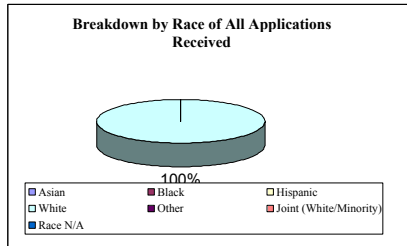


Century Bank Low-Income Mortgage Information

2000

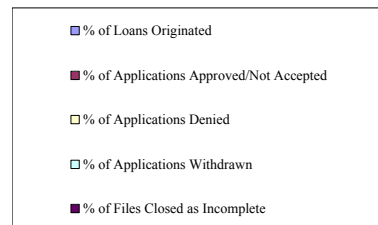
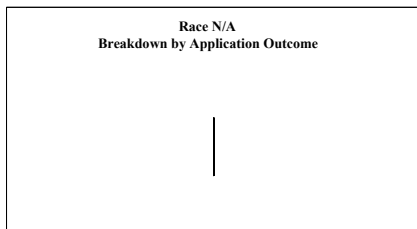
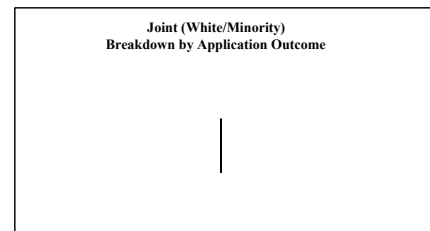
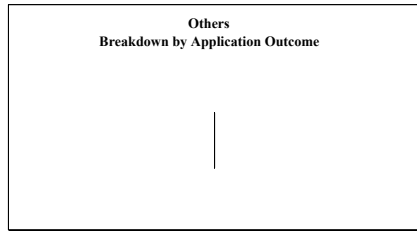
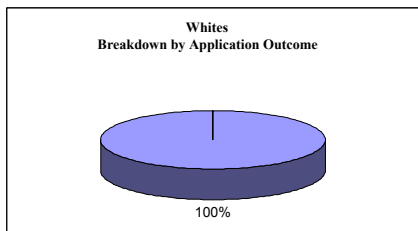
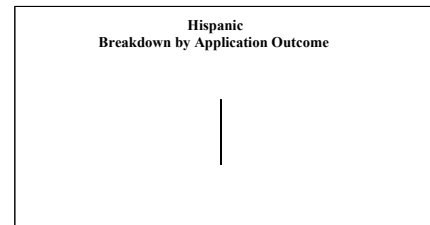
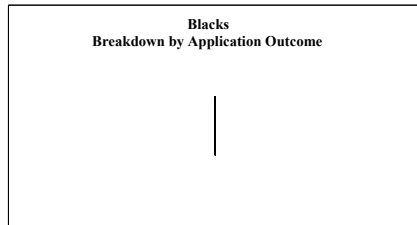
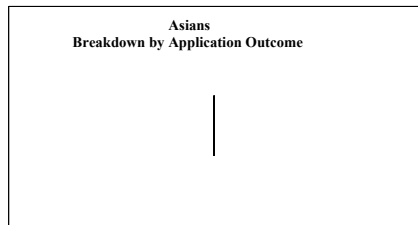
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Hispanic	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	1	100%	1	100%	0	0%	0	0%	0	0%	0	0%
Other	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	1	100%	1	100%	0	0%	0	0%	0	0%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.



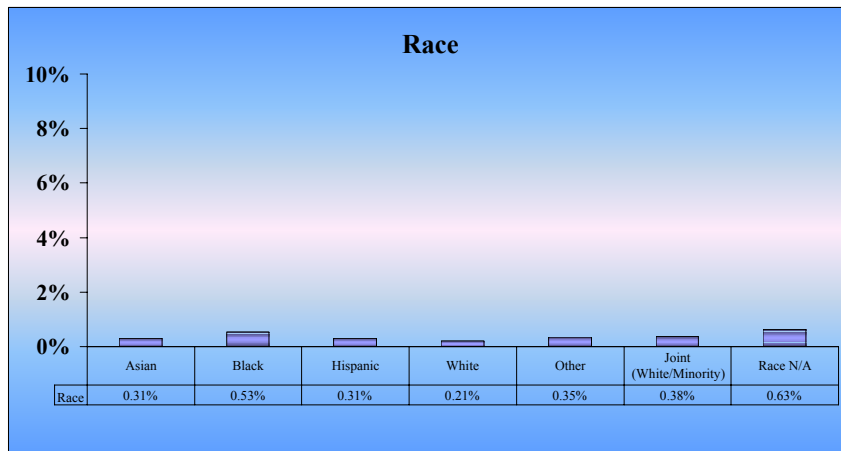
Compared against the MSA Aggregate Total

2000

Citizens Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Asian	9	0.31%	7	0.31%	0	0.00%	1	0.41%	1	0.58%	0	0.00%
Black	11	0.53%	5	0.40%	0	0.00%	5	1.13%	1	0.63%	0	0.00%
Hispanic	6	0.31%	6	0.46%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
White	98	0.21%	69	0.19%	7	0.21%	21	0.57%	1	0.04%	0	0.00%
Other	4	0.35%	1	0.13%	0	0.00%	3	1.91%	0	0.00%	0	0.00%
Joint (White/Minority)	4	0.38%	2	0.24%	1	1.52%	1	1.43%	0	0.00%	0	0.00%
Race N/A	48	0.63%	18	0.39%	7	0.85%	23	2.14%	0	0.00%	0	0.00%
Total	180	0.29%	108	0.23%	15	0.31%	54	0.90%	3	0.07%	0	0.00%

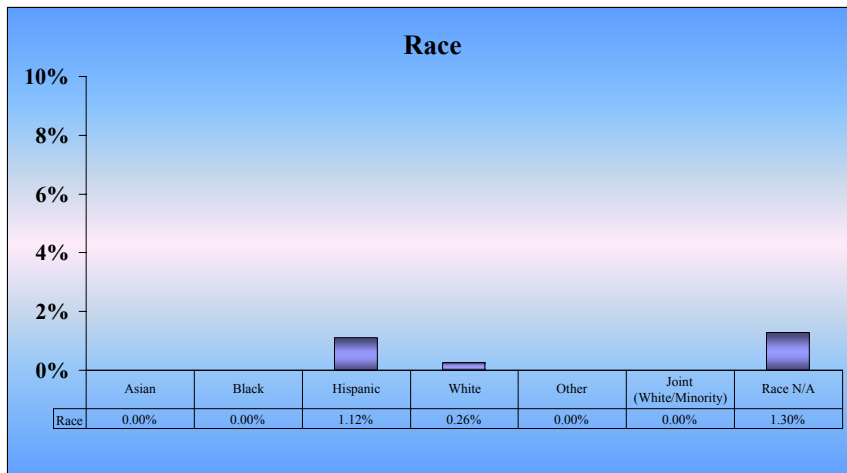
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Citizens Bank Low-Income Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Asian	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Black	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Hispanic	3	1.12%	3	1.68%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
White	6	0.26%	2	0.13%	0	0.00%	4	1.04%	0	0.00%	0	0.00%
Other	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	6	1.30%	1	0.60%	0	0.00%	5	3.68%	0	0.00%	0	0.00%
Total	15	0.42%	6	0.27%	0	0.00%	9	1.36%	0	0.00%	0	0.00%

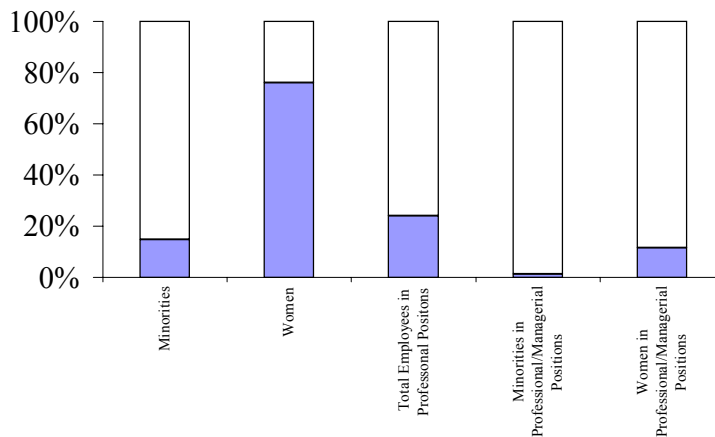
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Century Bank Employment Numbers

	Number of Employees	Percent of Total Employees
Total	339	
Minorities	50	15%
Women	258	76%
Total Employees In Professional Positions	81	24%
Minorities in Professional or Managerial Positions	4	1%
Women in Professional or Managerial Positions	39	12%

Century Bank and Trust



This chart illustrates the percentage of employees in each category measured against the total employee population. For example, the category **Minorities** represents the percentage of employees reported as minorities, regardless of gender, measured against the total population of bank employees; the category of **Minorities** in professional/managerial positions is the total number of reported minorities in professional/managerial positions, regardless of gender, when measured against the total population of bank employees. For raw number comparison see table above.

Century Bank and Trust Company Loan Information by Census Tract

[illegible]

MSA TOTAL													
LOAN ORIGINATED	11	100%	1763	8	80%	1000	5	83%	1350	3	75%	410	
APPROVED, NOT ACCEPTED							1	17%	581				
APP DENIED													
APP WITHDRAWN				2	20%	220				1	25%	120	
FILES CLOSED FOR INCOMPLETENESS													

MA/SUFFOLK/0003.00

LOAN ORIGINATED							
APPROVED, NOT ACCEPTED							
APP DENIED							
APP WITHDRAWN	1	100%	120			1	100% 120
FILES CLOSED FOR INCOMPLETENESS							

MA/SUFFOLK/0007.01

LOAN ORIGINATED	1	100%	500
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0303.00

LOAN ORIGINATED	1	100%	150	1	100%	150
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

[illegible]

LOAN ORIGINATED	1	100%	200	3	100%	790	1	100%	200
APPROVED, NOT ACCEPTED									
APP DENIED									
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

LOAN ORIGINATED	1	100%	90	1	100%	60
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

LOAN ORIGINATED	1	100%	186
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

LOAN ORIGINATED	1	100%	60	1	100%	60
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Century Bank and Trust Company Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0705.00

LOAN ORIGINATED	1	100%	209
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0710.00

LOAN ORIGINATED	1	100%	225			
APPROVED, NOT ACCEPTED				1	100%	581
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0821.00

LOAN ORIGINATED			
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN	1	100%	100
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1101.02

LOAN ORIGINATED	1	100%	180
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Century Bank and Trust Company Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1104.02

LOAN ORIGINATED	1	100%	50
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1105.02

LOAN ORIGINATED	1	100%	190
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1301.00

LOAN ORIGINATED	1	100%	125
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1304.01

LOAN ORIGINATED	1	100%	270
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Century Bank and Trust Company Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1603.00

LOAN ORIGINATED	1	100%	100
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1605.00

LOAN ORIGINATED	1	100%	50
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1606.00

LOAN ORIGINATED	1	100%	171
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1701.00

LOAN ORIGINATED	1	100%	60
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Century Bank and Trust Company Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1705.00

LOAN ORIGINATED	1	100%	110
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1707.00

LOAN ORIGINATED	1	100%	112
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1804.00

LOAN ORIGINATED	1	100%	225
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			



Citizens Bank



Overview

Citizens Bank of Massachusetts
28 State Street
Boston, MA 02110

Description

In 2000, Citizens Financial Group, headquartered in Providence Rhode Island, was a \$28 billion financial services company with four separately chartered banks in four New England States.

On January 11, 2000, Citizens Financial Group announced the acquisition of UST Corp making Citizens Bank the largest state chartered bank in the Commonwealth of Massachusetts. This acquisition increased the size of Citizens Bank of Massachusetts to \$14 billion. The transaction added 80 branches and more than \$4 billion in core deposits.³⁴

Principal Officers

President and CEO

Lawrence K. Fish
28 State Street
Boston, MA 02110
617-725-5800

Group Executive Vice President, Corporate Affairs

Heather P. Campion
28 State Street
Boston, MA 02110
617-725-5825

President & CEO, Citizens Bank of Massachusetts

Thomas J. Hollister
28 State Street
Boston, MA 02110
617-725-5800

Employees

Number of Employees	7,000
Number of Employees in Massachusetts	2,700
Percentage of Women Employees	68%
Percentage of Minority Employees	26%

Branches

Number of Branches - Total	164
Branches within Boston PSMA	34
Number of ATMs	509
Number of Free Standing ATMs	NA

CRA Rating

Rating Agency	FDIC
Most Recent Rating	1999
Overall Rating	OUTSTANDING ³⁵
Lending Test Rating	OUTSTANDING ³⁶
Investment Test Rating	HIGH SATISFACTORY ³⁷
Service Test Rating	OUTSTANDING ³⁸

³⁴ Citizens Bank web site/banknews

³⁵ Based on most recent CRA Performance Evaluation published by FDIC published 1999.

³⁶ Ibid.

³⁷ Ibid.

³⁸ Ibid.



Discussion

Overall rating: OUTSTANDING³⁹

Lending Test

Lending Test Rating: OUTSTANDING⁴⁰

General Responsiveness to Credit Needs

Citizens Bank of Massachusetts (CBM) is committed to providing affordable housing throughout the assessment areas, as is evidenced by the innovative and flexible mortgage products it offers, as well as the level of community-development lending in which it is engaged.

The distribution of loans to borrowers in low and moderate-income census tracts is much better than expected given the demographics and lending requirements.

Responsiveness to Low and Moderate-Income Credit Needs

CBM, in 1998, had the fourth largest market share of HMDA reportable loans within the assessment area (of 712 lenders).

The 1999 CRA report noted the innovative and flexible lending programs provided by CBM. These programs were viewed as evidence of the bank's commitment to providing affordable housing to residents throughout its assessment area.

From 1999 to 2000, there was a significant increase in the number of applications received for HMDA and low-income loans. Even though the number of applicants in each group rose, the percentage of loans originated decreased.

CBM participates in the following residential mortgage programs:

- Soft Second Program
- ACORN
- Citizens Flex Mortgage
- Appleseed
- New Citizens Immigrant Initiative

- Citizen's Bank of Massachusetts Down Payment and Closing Cost Assistance
- Boston Home Certificate Initiative
- Community Homebuyer Program/House Boston

Leadership in Community Development Loans

CBM originates a significant level of community development loans. The FDIC reported the following community development loans in 1999:

- \$4,100,000 – renovation of a 26-bed rest home and its conversion to a 40-unit assisted living facility.
- \$3,620,000 – construction loan for 1,500-space parking lot to ease the burden from the loss of 2,000 parking spaces at Logan Airport after the completion of the Ted Williams Tunnel.
- \$250,000 – Proceeds were used to provide working capital for a community-based, non-profit organization that provides services to battered woman and their children.
- \$200,000 – Proceeds were used to provide affordable home improvement loans to the residents of East Boston.
- \$150,000 – Proceeds were used to meet the working capital needs of a community-based, non-profit agency that works with the Roxbury District Court.
- \$100,000 – Proceeds were used to provide working capital line of credit for a community-based, non-profit organization.

Investment Test

Investment Test Rating: HIGH SATISFACTORY⁴¹

Many of CBM's investments are directed at Boston inner-city neighborhoods, low and moderate-income, and minority areas. The bank is involved in the Massachusetts Housing Equity Fund (MHEF) which provides affordable housing in the Greater Boston area, the Massachusetts Housing Partnership Fund (MHP) which was established by state statute to ensure that community based and affordable housing lending was performed at low cost.

³⁹ Based on most recent CRA Performance Evaluation by FDIC published 1999.

⁴⁰ Ibid.

⁴¹ Ibid.



Service Test

Service Test Rating: OUTSTANDING⁴²

Description of Service Delivery Systems

Over the past eight years, CBM has extended its commitment to making banking convenient for their customers. Through growth and acquisitions, their retail banking franchise has grown from 56 branches in and around Rhode Island, to a full-service network of more than 330 retail and in-store branch offices and 800 ATMs throughout their four-state market.

Branch-based, business banking officers are active in communities meeting the needs of small business customers.

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
2343 Washington Street Boston, MA		✓
20 Tremont Street Boston, MA	✓	
73 Tremont Street Boston, MA		✓
55 Summer Street Boston, MA		✓
One Financial Center Boston, MA		✓
26 Central Square East Boston, MA		✓
217 Adams Street Dorchester, MA		✓
568 Columbia Road Dorchester, MA		✓
1628 Tremont Street Boston, MA		✓
569 Washington Street Dorchester, MA		✓
315 Hanover Street Boston, MA		✓
1575 Blue Hill Avenue Mattapan, MA		✓
200 Summer Street Boston, MA	✓	
One Deaconess Way Boston, MA	✓	
33 Kilbuck Street Boston, MA	✓	
300 Terminal C East Boston, MA	✓	

FSB: Full Service Branch

Special Programs

CBM is involved in the following Community Development Services within Greater Boston:

- Neighborhood of Affordable Housing (NOAH)
- Association For Community Reform Now (ACORN)
- City Life / Vida Urbana
- Urban Edge
- Roslindale Village – A Boston Main Street Initiative
- Action for Community Development (ABCD)

⁴² Based on most recent CRA Performance Evaluation by FDIC published 1999.



Additional Information

Citizens Financial Group was named the Small Business Association's "New England Regional Lender of the Year" for 2001.

This was the third year (1998, 1999, 2001) that Citizens Financial Group was the #1 originator of SBA loans in New England.

On January 11, 2000, Citizens Financial Group announced the acquisition of UST Corp making Citizens Bank the largest state chartered bank in the Commonwealth of Massachusetts. The transaction added 80 branches to the Citizens network.

Year-Over-Year at a Glance

	1999	2000
HMDA Applications Received	77	180
HMDA Loans Originated	67	108
Low-Income Applications Received	5	15
Low-Income Loans Originated	3	6

From 1999 to 2000, there was a significant increase in the number of applications received for HMDA and low-income loans. Even though the number of applicants in each group rose, the percentage of loans originated decreased.



Source Documents

Community Reinvestment Act Performance
Evaluation, Federal Deposit Insurance
Corporation; October 12, 1999.

Annual CRA Report to Commissioner of Banks,
Commonwealth of Massachusetts; 2000.

FFIEC HMDA Aggregate & Disclosure
Software Version 2.0, Board of Governors of the
Federal Reserve System; 2000.

1999 Linked Deposit Report To the Mayor of the
City of Boston, NobleAssociates; June 2000.

Citizens Bank Annual Report; 2000.

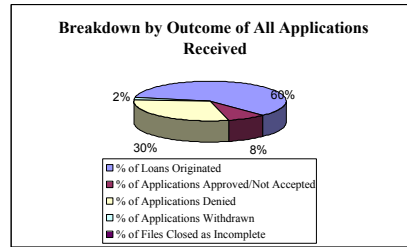
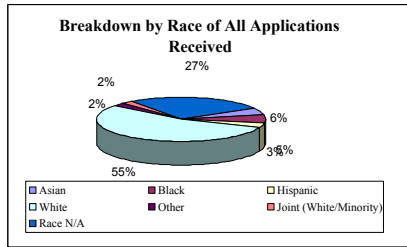
Citizens Bank website
<http://www.citizensbank.com/>

Citizens Bank Lending Information - HMDA

2000

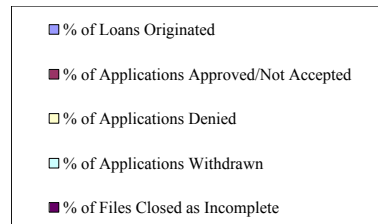
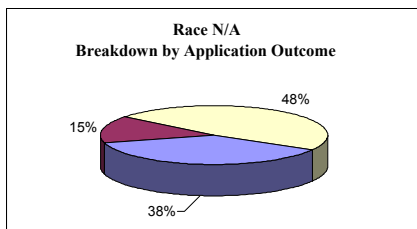
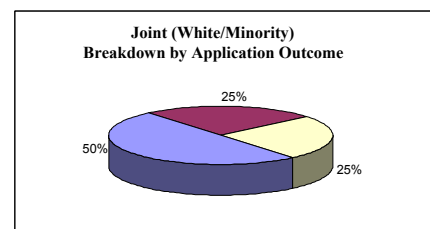
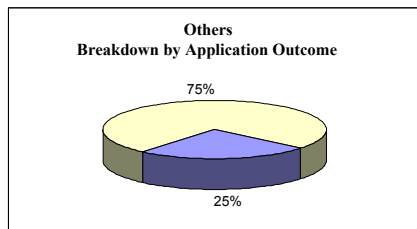
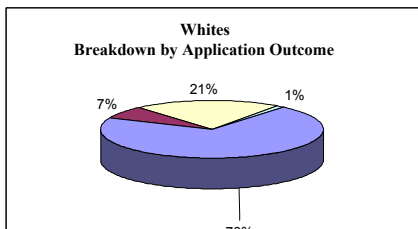
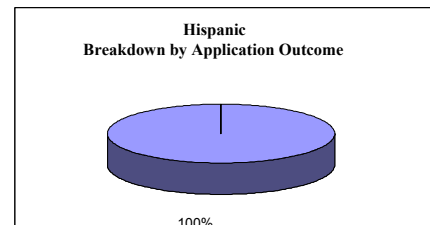
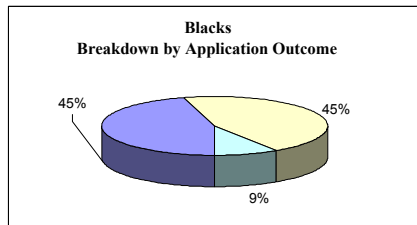
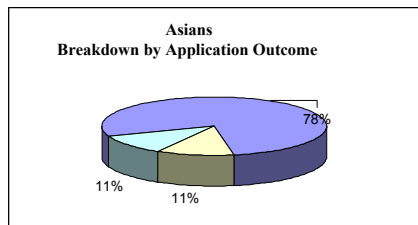
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	9	5%	7	78%	0	0%	1	11%	1	11%	0	0%
Black	11	6%	5	45%	0	0%	5	45%	1	9%	0	0%
Hispanic	6	3%	6	100%	0	0%	0	0%	0	0%	0	0%
White	98	54%	69	70%	7	7%	21	21%	1	1%	0	0%
Other	4	2%	1	25%	0	0%	3	75%	0	0%	0	0%
Joint (White/Minority)	4	2%	2	50%	1	25%	1	25%	0	0%	0	0%
Race N/A	48	27%	18	38%	7	15%	23	48%	0	0%	0	0%
Total	180	100%	108	60%	15	8%	54	30%	3	2%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

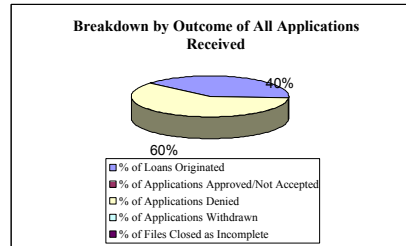
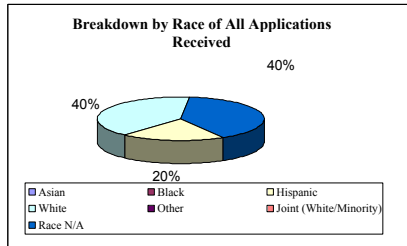


Citizens Bank Low-Income Mortgage Information

2000

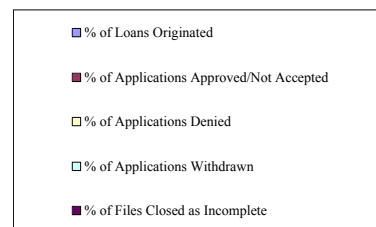
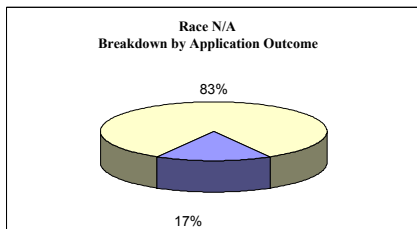
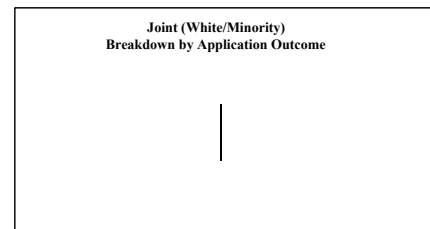
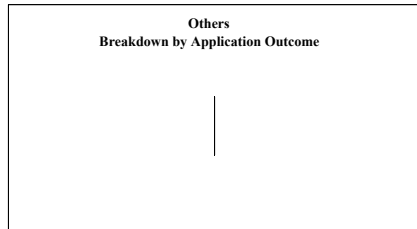
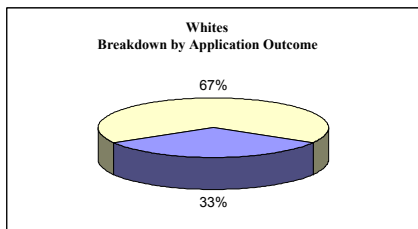
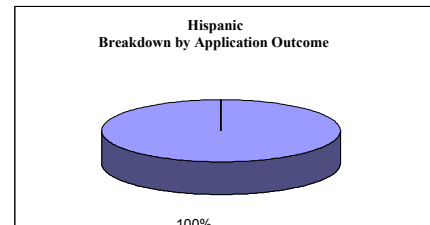
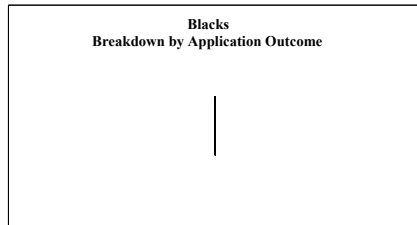
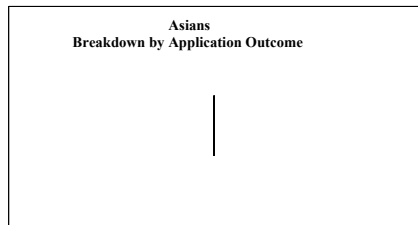
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Hispanic	3	20%	3	100%	0	0%	0	0%	0	0%	0	0%
White	6	40%	2	33%	0	0%	4	67%	0	0%	0	0%
Other	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	6	40%	1	17%	0	0%	5	83%	0	0%	0	0%
Total	15	100%	6	40%	0	0%	9	60%	0	0%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.



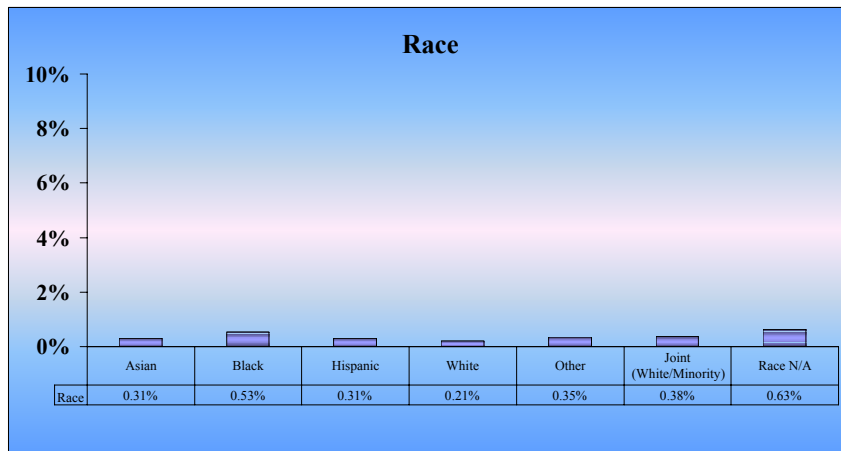
Compared against the MSA Aggregate Total

2000

Citizens Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Asian	9	0.31%	7	0.31%	0	0.00%	1	0.41%	1	0.58%	0	0.00%
Black	11	0.53%	5	0.40%	0	0.00%	5	1.13%	1	0.63%	0	0.00%
Hispanic	6	0.31%	6	0.46%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
White	98	0.21%	69	0.19%	7	0.21%	21	0.57%	1	0.04%	0	0.00%
Other	4	0.35%	1	0.13%	0	0.00%	3	1.91%	0	0.00%	0	0.00%
Joint (White/Minority)	4	0.38%	2	0.24%	1	1.52%	1	1.43%	0	0.00%	0	0.00%
Race N/A	48	0.63%	18	0.39%	7	0.85%	23	2.14%	0	0.00%	0	0.00%
Total	180	0.29%	108	0.23%	15	0.31%	54	0.90%	3	0.07%	0	0.00%

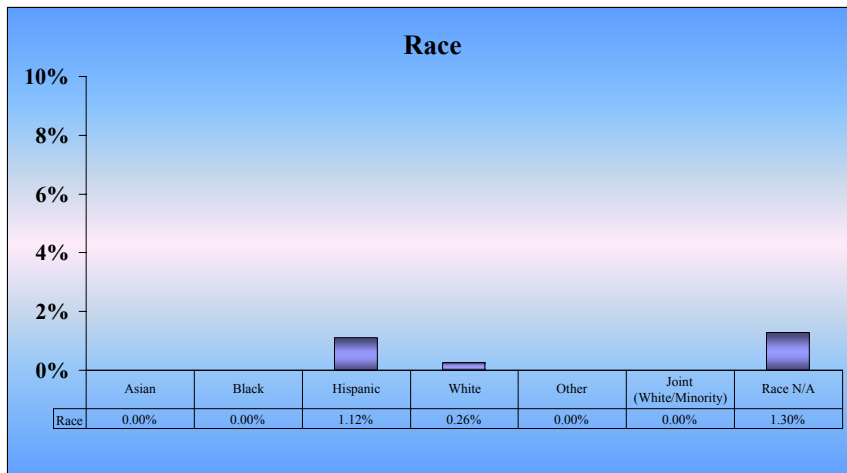
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Citizens Bank Low-Income Mortgage Information

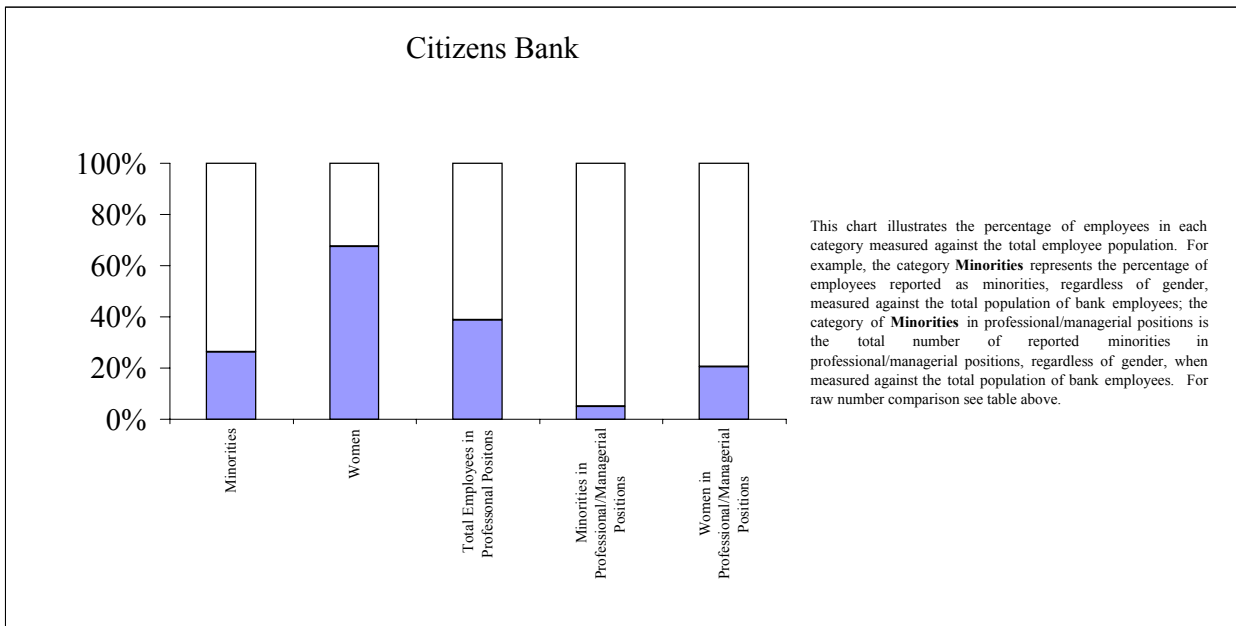
Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Asian	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Black	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Hispanic	3	1.12%	3	1.68%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
White	6	0.26%	2	0.13%	0	0.00%	4	1.04%	0	0.00%	0	0.00%
Other	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	6	1.30%	1	0.60%	0	0.00%	5	3.68%	0	0.00%	0	0.00%
Total	15	0.42%	6	0.27%	0	0.00%	9	1.36%	0	0.00%	0	0.00%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Citizens Bank Employment Information

	Number of Employees	Percent of Total Employees
Total	2484	
Minorities	654	26%
Women	1679	68%
Total Employees In Professional Positions	964	39%
Minorities in Professional or Managerial Positions	123	5%
Women in Professional or Managerial Positions	509	20%



Citizens Bank of Massachusetts

Loan Information by Census Tract

[illegible]

MSA TOTAL																
LOAN ORIGINATED	41	58%	12751	110	34%	7264	251	29%	8475	4	100%	2591	9	60%	6556	
APPROVED, NOT ACCEPTED	3	4%	402	20	6%	1227	57	7%	2026							
APP DENIED	26	37%	2854	198	60%	16053	564	65%	18528				6	40%	395	
APP WITHDRAWN	1	1%	228													
FILES CLOSED FOR INCOMPLETENESS																

MA/SUFFOLK/0001.00

LOAN ORIGINATED				2	50%	87
APPROVED, NOT ACCEPTED				1	25%	25
APP DENIED	1	100%	20	1	25%	25
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0002.01

LOAN ORIGINATED	2	67%	151	1	20%	40
APPROVED, NOT ACCEPTED				1	20%	20
APP DENIED	1	33%	65	3	60%	65
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0002.02

LOAN ORIGINATED				2	50%	70
APPROVED, NOT ACCEPTED						
APP DENIED	1	100%	306	2	50%	90
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Citizens Bank of Massachusetts Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0003.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	7	100%	330	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/0004.01

LOAN ORIGINATED	1	50%	51	1	33%	20
APPROVED, NOT ACCEPTED				1	33%	100
APP DENIED	1	50%	12	1	33%	35
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0004.02

[illegible]

MA/SUFFOLK/0005.01

LOAN ORIGINATED	1	100%	40	1	100%	800
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Citizens Bank of Massachusetts Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans			Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D & E		
A			B			C			D			E					
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's

MA/SUFFOLK/0006.01

[illegible]

MA/SUFFOLK/0007.01

LOAN ORIGINATED						
APPROVED, NOT ACCEPTED				1	100%	10
APP DENIED	1	100%	30			
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0007.02

LOAN ORIGINATED			
APPROVED, NOT ACCEPTED	1	100%	40
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0008.01

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	1	100%	25	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

Citizens Bank of Massachusetts

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0008.02

LOAN ORIGINATED						
APPROVED, NOT ACCEPTED	1	50%	10			
APP DENIED	1	50%	12	1	100%	218
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0101.01

LOAN ORIGINATED	2	67%	100	2	67%	200
APPROVED, NOT ACCEPTED	1	33%	37			
APP DENIED				1	33%	30
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0102.00

LOAN ORIGINATED	1	50%	96				1	100%	96
APPROVED, NOT ACCEPTED	1	50%	50						
APP DENIED				5	100%	70			
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/0104.02

LOAN ORIGINATED	1	100%	15
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Citizens Bank of Massachusetts

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0105.00

LOAN ORIGINATED	1	100%	15
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0106.00

LOAN ORIGINATED	3	100%	5399	2	100%	4768
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0107.00

LOAN ORIGINATED	1	100%	175
APPROVED, NOT ACCEPTED			
APP DENIED	2	100%	68
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0108.00

[illegible]

Citizens Bank of Massachusetts Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0201.00

LOAN ORIGINATED	1	100%	500	1	33%	20
APPROVED, NOT ACCEPTED				2	67%	70
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0202.00

LOAN ORIGINATED	1	50%	400				1	100%	400
APPROVED, NOT ACCEPTED									
APP DENIED	1	50%	40	1	100%	70			
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/0203.00

LOAN ORIGINATED	2	100%	285	2	67%	55
APPROVED, NOT ACCEPTED						
APP DENIED				1	33%	200
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0301.00

LOAN ORIGINATED	1	50%	20
APPROVED, NOT ACCEPTED			
APP DENIED	1	50%	15
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Citizens Bank of Massachusetts

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
									Home Improvement Loans			Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D & E		
FHA, FSA/RHS & VA			Conventional			Refinancings											
A			B			C			D			E					
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's

MA/SUFFOLK/0401.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	3	100%	75	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/0402.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED	1	50%	30	
APP DENIED	1	50%	88	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/0403.00

LOAN ORIGINATED				2	40%	24
APPROVED, NOT ACCEPTED	1	100%	100			
APP DENIED				3	60%	125
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0404.00

[illegible]

Citizens Bank of Massachusetts Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0502.00

LOAN ORIGINATED						
APPROVED, NOT ACCEPTED				2	20%	60
APP DENIED				2	100%	93
APP WITHDRAWN				8	80%	156
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0504.00

LOAN ORIGINATED	1	100%	80			
APPROVED, NOT ACCEPTED				1	11%	20
APP DENIED				8	89%	330
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0506.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	2	100%	155	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/0507.00

LOAN ORIGINATED	1	50%	35
APPROVED, NOT ACCEPTED			
APP DENIED	1	50%	5
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Citizens Bank of Massachusetts

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0508.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	1	100%	30	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/0509.00

LOAN ORIGINATED	1	100%	30		
APPROVED, NOT ACCEPTED					
APP DENIED			10	100%	171
APP WITHDRAWN					
FILES CLOSED FOR INCOMPLETENESS					

MA/SUFFOLK/0510.00

LOAN ORIGINATED	1	100%	23		
APPROVED, NOT ACCEPTED					
APP DENIED			4	100%	100
APP WITHDRAWN					
FILES CLOSED FOR INCOMPLETENESS					

MA/SUFFOLK/0511.00

LOAN ORIGINATED	1	50%	286	1	33%	15
APPROVED, NOT ACCEPTED						
APP DENIED	1	50%	200	2	67%	60
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Citizens Bank of Massachusetts

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0512.00

LOAN ORIGINATED	1	100%	65	2	50%	35
APPROVED, NOT ACCEPTED						
APP DENIED				2	50%	26
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0601.00

LOAN ORIGINATED	1	100%	191	2	67%	85	5	50%	160
APPROVED, NOT ACCEPTED							1	10%	10
APP DENIED				1	33%	69	4	40%	250
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/0602.00

LOAN ORIGINATED	2	100%	167	2	50%	120
APPROVED, NOT ACCEPTED						
APP DENIED				2	50%	50
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0603.00

LOAN ORIGINATED							
APPROVED, NOT ACCEPTED							
APP DENIED	1	100%	64	2	100%	75	
APP WITHDRAWN							
FILES CLOSED FOR INCOMPLETENESS							

Citizens Bank of Massachusetts Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0604.00

LOAN ORIGINATED	1	100%	147	2	67%	80
APPROVED, NOT ACCEPTED						
APP DENIED				1	33%	30
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0605.00

LOAN ORIGINATED	1	100%	17			
APPROVED, NOT ACCEPTED						
APP DENIED	1	100%	268	4	100%	125
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0606.00

LOAN ORIGINATED	1	33%	30
APPROVED, NOT ACCEPTED			
APP DENIED	2	67%	71
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0608.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	1	100%	90	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

Citizens Bank of Massachusetts Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0609.00

LOAN ORIGINATED	1	100%	130	3	33%	127
APPROVED, NOT ACCEPTED						
APP DENIED			2	100%	183	6
APP WITHDRAWN					67%	175
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0610.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	2	100%	155	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/0612.00

LOAN ORIGINATED							
APPROVED, NOT ACCEPTED							
APP DENIED	1	100%	80	2	100%	50	
APP WITHDRAWN							
FILES CLOSED FOR INCOMPLETENESS							

MA/SUFFOLK/0613.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	1	100%	30	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

Citizens Bank of Massachusetts

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0614.00

LOAN ORIGINATED	1	100%	530
APPROVED, NOT ACCEPTED			
APP DENIED	1	100%	34
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0701.00

LOAN ORIGINATED								
APPROVED, NOT ACCEPTED	1	100%	40					
APP DENIED				1	100%	30	1	100% 25
APP WITHDRAWN								
FILES CLOSED FOR INCOMPLETENESS								

MA/SUFFOLK/0703.00

LOAN ORIGINATED	2	40%	83
APPROVED, NOT ACCEPTED	1	20%	20
APP DENIED	2	40%	135
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0705.00

LOAN ORIGINATED	1	50%	578			
APPROVED, NOT ACCEPTED						
APP DENIED	1	50%	10	1	100%	116
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Citizens Bank of Massachusetts Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0706.00

LOAN ORIGINATED	1	50%	552	3	100%	84
APPROVED, NOT ACCEPTED						
APP DENIED	1	50%	366			
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0707.00

LOAN ORIGINATED	1	100%	350	1	100%	350
APPROVED, NOT ACCEPTED						
APP DENIED	2	100%	275			
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0708.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	1	100%	137	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/0709.00

LOAN ORIGINATED				3	50%	75
APPROVED, NOT ACCEPTED						
APP DENIED	2	100%	310	3	50%	95
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Citizens Bank of Massachusetts Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0710.00

LOAN ORIGINATED			
APPROVED, NOT ACCEPTED	1	100%	20
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0712.00

LOAN ORIGINATED	2	67%	80
APPROVED, NOT ACCEPTED			
APP DENIED	1	33%	100
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0801.00

LOAN ORIGINATED							
APPROVED, NOT ACCEPTED							
APP DENIED	1	100%	80	2	100%	96	
APP WITHDRAWN							
FILES CLOSED FOR INCOMPLETENESS							

MA/SUFFOLK/0802.00

LOAN ORIGINATED				2	22%	68
APPROVED, NOT ACCEPTED				1	11%	60
APP DENIED	1	100%	67	6	67%	334
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Citizens Bank of Massachusetts Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0803.00

LOAN ORIGINATED			
APPROVED, NOT ACCEPTED			
APP DENIED	3	100%	78
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0805.00

LOAN ORIGINATED			
APPROVED, NOT ACCEPTED			
APP DENIED	2	100%	83
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0806.00

LOAN ORIGINATED			
APPROVED, NOT ACCEPTED			
APP DENIED	1	100%	75
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0809.00

LOAN ORIGINATED	2	67%	120
APPROVED, NOT ACCEPTED			
APP DENIED	1	100%	100
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Citizens Bank of Massachusetts Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0810.00

LOAN ORIGINATED	1	100%	100			
APPROVED, NOT ACCEPTED				1	50%	100
APP DENIED				1	50%	85
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0811.00

LOAN ORIGINATED	1	33%	55			
APPROVED, NOT ACCEPTED				1	25%	44
APP DENIED	2	67%	290	3	75%	52
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0812.00

LOAN ORIGINATED	1	33%	26
APPROVED, NOT ACCEPTED			
APP DENIED	2	67%	60
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0813.00

LOAN ORIGINATED				1	33%	30
APPROVED, NOT ACCEPTED						
APP DENIED	1	100%	250	2	67%	130
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Citizens Bank of Massachusetts Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0814.00

LOAN ORIGINATED	2	100%	169	4	80%	260
APPROVED, NOT ACCEPTED				1	20%	20
APP DENIED	1	100%	10			
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0815.00

LOAN ORIGINATED	2	100%	240	1	100%	155
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0816.00

LOAN ORIGINATED	1	33%	20
APPROVED, NOT ACCEPTED			
APP DENIED	2	67%	90
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0817.00

LOAN ORIGINATED	2	50%	75	1	100%	125
APPROVED, NOT ACCEPTED						
APP DENIED	2	50%	65			
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Citizens Bank of Massachusetts Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0818.00

LOAN ORIGINATED							
APPROVED, NOT ACCEPTED							
APP DENIED	1	100%	108	5	100%	158	
APP WITHDRAWN							
FILES CLOSED FOR INCOMPLETENESS							

MA/SUFFOLK/0819.00

LOAN ORIGINATED	2	50%	60
APPROVED, NOT ACCEPTED			
APP DENIED	2	50%	53
APP WITHDRAWN	1	100%	228
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0820.00

LOAN ORIGINATED	1	100%	162	1	20%	60	1	100%	162
APPROVED, NOT ACCEPTED									
APP DENIED			4	100%	562	4	80%	85	
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/0821.00

LOAN ORIGINATED							
APPROVED, NOT ACCEPTED							
APP DENIED	2	100%	87	3	100%	115	
APP WITHDRAWN							
FILES CLOSED FOR INCOMPLETENESS							

Citizens Bank of Massachusetts

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0901.00

LOAN ORIGINATED				2	17%	30
APPROVED, NOT ACCEPTED				1	8%	180
APP DENIED	4	100%	270	9	75%	178
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0902.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	2	100%	60	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/0903.00

LOAN ORIGINATED				1	17%	20
APPROVED, NOT ACCEPTED	1	100%	114			
APP DENIED				5	83%	214
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0904.00

LOAN ORIGINATED	1	25%	10
APPROVED, NOT ACCEPTED			
APP DENIED	3	75%	50
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Citizens Bank of Massachusetts

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
									Home Improvement Loans			Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D & E		
FHA, FSA/RHS & VA			Conventional			Refinancings											
A			B			C			D			E					
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's

MA/SUFFOLK/0905.00

LOAN ORIGINATED							
APPROVED, NOT ACCEPTED							
APP DENIED	1	100%	144	2	100%	40	
APP WITHDRAWN							
FILES CLOSED FOR INCOMPLETENESS							

MA/SUFFOLK/0906.00

LOAN ORIGINATED	1	25%	15			
APPROVED, NOT ACCEPTED				1	14%	20
APP DENIED	3	75%	442	6	86%	188
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0907.00

LOAN ORIGINATED	1	100%	100	3	75%	133	2	40%	160
APPROVED, NOT ACCEPTED									
APP DENIED				1	25%	60	3	60%	148
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/0908.00

LOAN ORIGINATED	1	33%	40
APPROVED, NOT ACCEPTED	1	33%	130
APP DENIED	1	33%	50
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Citizens Bank of Massachusetts

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
									Home Improvement Loans			Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D & E		
FHA, FSA/RHS & VA			Conventional			Refinancings											
A			B			C			D			E					
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's

MA/SUFFOLK/0909.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	1	100%	2	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/0910.00

LOAN ORIGINATED	3	75%	86	2	67%	30
APPROVED, NOT ACCEPTED						
APP DENIED	1	25%	28	1	33%	40
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0911.00

LOAN ORIGINATED	1	100%	60	4	57%	121
APPROVED, NOT ACCEPTED						
APP DENIED				3	43%	110
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0912.00

LOAN ORIGINATED	1	100%	35			
APPROVED, NOT ACCEPTED						
APP DENIED	1	100%	100	6	100%	242
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Citizens Bank of Massachusetts Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0913.00

LOAN ORIGINATED							
APPROVED, NOT ACCEPTED							
APP DENIED	1	100%	44	6	100%	161	
APP WITHDRAWN							
FILES CLOSED FOR INCOMPLETENESS							

MA/SUFFOLK/0914.00

LOAN ORIGINATED	1	33%	20
APPROVED, NOT ACCEPTED			
APP DENIED	2	100%	262
APP WITHDRAWN	2	67%	25
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0915.00

LOAN ORIGINATED	1	50%	209	1	50%	30	3	23%	75
APPROVED, NOT ACCEPTED							1	8%	8
APP DENIED	1	50%	200	1	50%	75	9	69%	116
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/0916.00

LOAN ORIGINATED	1	25%	80			
APPROVED, NOT ACCEPTED						
APP DENIED	3	75%	142	5	100%	199
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Citizens Bank of Massachusetts Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0921.00

LOAN ORIGINATED				4	67%	299	2	22%	60
APPROVED, NOT ACCEPTED									
APP DENIED	2	100%	100	2	33%	78	7	78%	113
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/0922.00

LOAN ORIGINATED	1	33%	150	3	38%	181
APPROVED, NOT ACCEPTED						
APP DENIED	2	67%	100	5	63%	290
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0923.00

LOAN ORIGINATED	3	33%	235	1	17%	10
APPROVED, NOT ACCEPTED				1	17%	18
APP DENIED	6	67%	691	4	67%	145
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0924.00

LOAN ORIGINATED	3	33%	60
APPROVED, NOT ACCEPTED			
APP DENIED	6	67%	175
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Citizens Bank of Massachusetts Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1001.00

LOAN ORIGINATED	1	50%	70	1	11%	15
APPROVED, NOT ACCEPTED						
APP DENIED	1	50%	80	8	89%	77
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1002.00

LOAN ORIGINATED	1	100%	75
APPROVED, NOT ACCEPTED			
APP DENIED			6 100% 139
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1003.00

LOAN ORIGINATED	1	50%	190	1	25%	32	3	38%	83
APPROVED, NOT ACCEPTED									
APP DENIED	1	50%	60	3	75%	214	5	63%	160
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/1004.00

LOAN ORIGINATED				4	29%	120
APPROVED, NOT ACCEPTED	1	50%	120	3	21%	52
APP DENIED	1	50%	106	7	50%	176
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Citizens Bank of Massachusetts Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1005.00

[illegible]

MA/SUFFOLK/1006.01

[illegible]

MA/SUFFOLK/1006.02

LOAN ORIGINATED	1	50%	15			
APPROVED, NOT ACCEPTED				1	17%	14
APP DENIED	1	50%	20	5	83%	83
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1007.00

LOAN ORIGINATED	2	40%	34	2	22%	48
APPROVED, NOT ACCEPTED				1	11%	15
APP DENIED	3	60%	208	6	67%	272
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Citizens Bank of Massachusetts

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1008.00

LOAN ORIGINATED	3	100%	170	4	25%	70
APPROVED, NOT ACCEPTED				2	13%	125
APP DENIED				10	63%	267
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1009.00

LOAN ORIGINATED	1	50%	47	4	33%	74
APPROVED, NOT ACCEPTED						
APP DENIED	1	50%	75	8	67%	134
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1010.01

LOAN ORIGINATED	3	38%	193	4	24%	131
APPROVED, NOT ACCEPTED				1	6%	4
APP DENIED	5	63%	283	12	71%	397
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1010.02

LOAN ORIGINATED				3	30%	131
APPROVED, NOT ACCEPTED						
APP DENIED	4	100%	115	7	70%	114
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Citizens Bank of Massachusetts Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1011.01

LOAN ORIGINATED				2	13%	40
APPROVED, NOT ACCEPTED	1	25%	70			
APP DENIED	3	75%	270	13	87%	493
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1011.02

LOAN ORIGINATED	1	50%	15	2	40%	60
APPROVED, NOT ACCEPTED						
APP DENIED	1	50%	180	3	60%	39
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1101.02

LOAN ORIGINATED	1	100%	144	3	21%	52
APPROVED, NOT ACCEPTED				2	14%	20
APP DENIED				9	64%	294
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1102.00

LOAN ORIGINATED	1	100%	28	1	17%	20
APPROVED, NOT ACCEPTED						
APP DENIED				5	83%	131
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Citizens Bank of Massachusetts Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1103.00

[illegible]

MA/SUFFOLK/1104.01

LOAN ORIGINATED	1	100%	45	2	33%	74
APPROVED, NOT ACCEPTED				1	17%	12
APP DENIED			3	100%	243	3
APP WITHDRAWN					50%	83
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1104.02

[illegible]

MA/SUFFOLK/1105.01

LOAN ORIGINATED	1	25%	45	1	33%	70
APPROVED, NOT ACCEPTED	1	25%	25			
APP DENIED	2	50%	48	2	67%	22
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Citizens Bank of Massachusetts Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1202.00

LOAN ORIGINATED						3	27%	62	
APPROVED, NOT ACCEPTED				1	100%	60	2	18%	20
APP DENIED	1	100%	75				6	55%	90
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/1203.00

LOAN ORIGINATED	1	50%	250				
APPROVED, NOT ACCEPTED							
APP DENIED	1	50%	205	6	100%	280	
APP WITHDRAWN							
FILES CLOSED FOR INCOMPLETENESS							

MA/SUFFOLK/1204.00

LOAN ORIGINATED	3	100%	81	3	43%	64
APPROVED, NOT ACCEPTED						
APP DENIED				4	57%	139
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1205.00

LOAN ORIGINATED	1	100%	30	3	43%	217
APPROVED, NOT ACCEPTED						
APP DENIED				4	57%	175
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Citizens Bank of Massachusetts Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1206.00

LOAN ORIGINATED	1	50%	35
APPROVED, NOT ACCEPTED			
APP DENIED	1	50%	100
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1301.00

LOAN ORIGINATED	3	60%	130	2	33%	80
APPROVED, NOT ACCEPTED	1	20%	65	1	17%	10
APP DENIED	1	20%	75	3	50%	210
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1302.00

LOAN ORIGINATED	4	100%	259	5	71%	159
APPROVED, NOT ACCEPTED				1	14%	8
APP DENIED				1	14%	50
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1303.00

LOAN ORIGINATED	6	86%	217
APPROVED, NOT ACCEPTED			
APP DENIED	1	14%	15
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Citizens Bank of Massachusetts Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1304.01

LOAN ORIGINATED				2	40%	175	4	44%	126
APPROVED, NOT ACCEPTED				1	20%	55			
APP DENIED	1	100%	29	2	40%	110	5	56%	134
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/1304.02

LOAN ORIGINATED	1	100%	139	2	40%	110	6	55%	205
APPROVED, NOT ACCEPTED							1	9%	30
APP DENIED				3	60%	97	4	36%	103
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/1401.01

LOAN ORIGINATED	1	100%	10	2	40%	45	3	20%	60
APPROVED, NOT ACCEPTED							1	7%	15
APP DENIED				3	60%	154	11	73%	241
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/1401.02

LOAN ORIGINATED	2	100%	95					
APPROVED, NOT ACCEPTED				1	25%	115		
APP DENIED				3	75%	154	4	100%
APP WITHDRAWN							112	
FILES CLOSED FOR INCOMPLETENESS								

Citizens Bank of Massachusetts Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1402.00

LOAN ORIGINATED	1	100%	306	1	25%	30	2	18%	45
APPROVED, NOT ACCEPTED							1	9%	40
APP DENIED				3	75%	173	8	73%	176
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/1403.00

LOAN ORIGINATED				1	8%	10
APPROVED, NOT ACCEPTED	1	17%	60			
APP DENIED	5	83%	382	11	92%	382
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1404.00

LOAN ORIGINATED	1	6%	39	5	29%	169
APPROVED, NOT ACCEPTED	2	13%	191	2	12%	15
APP DENIED	13	81%	851	10	59%	585
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1601.00

LOAN ORIGINATED										
APPROVED, NOT ACCEPTED										
APP DENIED	1	100%	180	1	100%	100	4	100%	23	
APP WITHDRAWN										
FILES CLOSED FOR INCOMPLETENESS										

Citizens Bank of Massachusetts

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1602.00

LOAN ORIGINATED							
APPROVED, NOT ACCEPTED							
APP DENIED	1	100%	230		5	100%	115
APP WITHDRAWN							
FILES CLOSED FOR INCOMPLETENESS							

MA/SUFFOLK/1603.00

LOAN ORIGINATED			
APPROVED, NOT ACCEPTED	1	100%	10
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1604.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	4	100%	37	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/1605.00

LOAN ORIGINATED	1	100%	61	2	29%	50		
APPROVED, NOT ACCEPTED								
APP DENIED			3	100%	156	5	71%	97
APP WITHDRAWN								
FILES CLOSED FOR INCOMPLETENESS								

Citizens Bank of Massachusetts

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1606.00

[illegible]

MA/SUFFOLK/1701.00

LOAN ORIGINATED	2	100%	73	2	33%	35
APPROVED, NOT ACCEPTED						
APP DENIED	1	100%	5	4	67%	168
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1702.00

LOAN ORIGINATED				3	38%	170
APPROVED, NOT ACCEPTED						
APP DENIED	2	100%	185	5	63%	145
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1703.00

LOAN ORIGINATED	3	43%	177	3	43%	80
APPROVED, NOT ACCEPTED	2	29%	81			
APP DENIED	2	29%	155	4	57%	63
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Citizens Bank of Massachusetts Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1704.00

LOAN ORIGINATED				3	33%	138
APPROVED, NOT ACCEPTED				1	11%	136
APP DENIED	1	100%	40	5	56%	229
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1705.00

[illegible]

MA/SUFFOLK/1706.00

LOAN ORIGINATED				1	14%	25
APPROVED, NOT ACCEPTED						
APP DENIED	2	100%	86	6	86%	166
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1707.00

LOAN ORIGINATED	1	17%	10	1	25%	15
APPROVED, NOT ACCEPTED				1	25%	113
APP DENIED	5	83%	535	2	50%	22
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Citizens Bank of Massachusetts

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1708.00

LOAN ORIGINATED				2	67%	123			
APPROVED, NOT ACCEPTED							1	17%	35
APP DENIED	1	100%	75	1	33%	42	5	83%	128
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/1801.00

LOAN ORIGINATED	2	67%	187	5	83%	237
APPROVED, NOT ACCEPTED						
APP DENIED	1	33%	45	1	17%	20
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1802.00

LOAN ORIGINATED				3	75%	144	5	71%	151
APPROVED, NOT ACCEPTED									
APP DENIED	1	100%	26	1	25%	105	2	29%	80
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/1803.00

LOAN ORIGINATED	2	100%	146	2	100%	55
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Citizens Bank of Massachusetts

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1804.00

LOAN ORIGINATED			
APPROVED, NOT ACCEPTED			
APP DENIED	3	100%	95
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1805.00

LOAN ORIGINATED						
APPROVED, NOT ACCEPTED				1	33%	17
APP DENIED				4	100%	122
APP WITHDRAWN				2	67%	215
FILES CLOSED FOR INCOMPLETENESS						



East Boston Savings Bank



Overview

East Boston Savings Bank
10 Meridian Street
East Boston, MA

Description

East Boston Savings Bank is a subsidiary of Meridian Mutual Holding Company, a bank holding company. Located in East Boston, East Boston Savings is a \$520 million community bank. East Boston's primary focus is the origination of residential mortgage loans.

Principal Officers

CEO

Paul Vernonck
10 Meridian Street
East Boston, MA
617568-4211

CFO

Leodard Siuda
10 Meridian Street
East Boston, MA
617568-4220

Compliance Officer

Philip Freehan
10 Meridian Street
East Boston, MA
617-568-4258

Employees

Number of Employees	NA
Number of Employees in Massachusetts	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches - Total	8
Branches within Boston PSMA	8
Number of ATMs	12
Number of Free Standing ATMs	4

CRA Rating

Rating Agency	FDIC
Most Recent Rating	1999
Overall Rating	SATISFACTORY ⁴³
Lending Test Rating	OUTSTANDING
Investment Test Rating	LOW SATISFACTORY
Service Test Rating	HIGH SATISFACTORY

⁴³ Based on most recent CRA Performance Evaluation by FDIC published 1999.



Discussion

Overall rating: SATISFACTORY⁴⁴

Lending Test

Lending Test Rating: OUTSTANDING⁴⁵

According to the most recent FDIC report, East Boston Savings Bank (EBSB) originated the majority of its residential mortgage loans within its assessment area. Lending increased within its assessment area despite the EBSB's modest asset size and increasing competition. Year over year (1999 to 2000) results also indicate an increase in low income applications resulting in an increase in originated loans from 11 to 17.

General Responsiveness to Credit Needs:

EBSB's lending activity to moderate-income individuals remained stable and, in fact, exceeded the number of moderate-income households.

Responsiveness to Low and Moderate-Income Credit Needs

As referenced in the 1999 report, there is a less-than-favorable relationship between low-income originations and low-income households. The figure for low-income households in the assessment area was 29.3% at the time of the 1999 review. Many of these households had incomes below the poverty level.

Applications and originations for low-income mortgages at EBSB increased over 60% from 1999 to 2000.⁴⁶

As of the 2000 Report to the Commissioner of Banks, East Boston Savings Bank participated in, or has, the following mortgage programs for homebuyers in the low and moderate-income brackets.

EBSB participated in several federal, state and locally funded mortgage assistance and home

buyers programs to benefit low-income borrowers.

- Maximum annual income: \$75,000 First Time Homebuyer – For properties located in East Boston, Winthrop, Revere, Saugus, Melrose, Wakefield, Lynnfield, Peabody, Danvers, Middleton, N. Reading.
- Maximum annual income \$60,000 - \$69,000 MHFA General Lending – Eligibility requirements are set by the MHFA for 1-4 family homes or condos in Massachusetts.
- Maximum annual income \$60,000 City of Boston “Homeworks” - City of Boston Facilities Department Certificate of Eligibility.
- FNMA – Enhanced Fannie – For property within the Bank's CRA area, up to a maximum income or 120% of median family income.
- Neighbors of HUD – There are no income limits for East Boston and Winthrop homebuyers; for 1-family, owner occupied properties, condominiums, or townhouses.
- FNMA Community Home Improvement – Central city locations, or maximum family income of 120% of median family income of HUD; 1-family, owner occupied homes and condominiums.

Leadership in Community Development Loans

As referenced in the 1999 report generated by the FDIC, East Boston Savings Bank had originated 7 community development loans totaling \$1.8 million.

The following is a listing of the Community/Economic Loans generated by East Boston Savings Bank in the year 2000:

- East Boston Social Center (renewal) – (Non-profit), for cash flow needs and community programs; amount \$50,000.
- Savio Prep (renewal) – (Non-profit), local college preparatory high school; amount \$100,000.

⁴⁴ Based on most recent CRA Performance Evaluation by FDIC published 1999.

⁴⁵ Ibid.

⁴⁶ FFIEC 1999 & 2000 Data Reports, Aggregate and Disclosure



- East Boston Community Development Corp., Inc. – Acquisition of land to construct affordable housing; amount \$50,000.

Investment Test

Investment Test Rating: LOW SATISFACTORY⁴⁷

The 1999 FDIC report showed \$39,735 in qualified investments made by East Boston Savings Bank. In 2000, East Boston increased this amount to \$41,141. A list of the qualified investments made by EBSB is provided in Appendix A.

Service Test

Service Test Rating: HIGH SATISFACTORY⁴⁸

Description Service Delivery Systems

Retail services are accessible to all portions of the bank's assessment area. The five offices listed below are located in the bank's low and moderate-income areas.

East Boston Savings Bank provides 24-hour banking with EBSB-Online internet banking. They also provide 24-hour access to account information via their 'Easy Access Line' telephone banking service. The Bank also has a website www.ebsb.com. There are two loan centers one at 1150 Saratoga Street, East Boston, MA 02128; and Lynnfield Woods Mortgage Center, 220 Broadway, Lynnfield, MA 01940.

Branch Information:

Branch locations in the Boston MSA:

Location	ATM	FSB
Ten Meridian Street East Boston 02128		✓
One Bennington Street East Boston 02128	✓	✓
856 Bennington Street East Boston 02128	✓	✓
246 Border Street East Boston 02128 (In-Store, Shaw's Supermarket)	✓	✓
575 Broadway Revere 02151	✓	✓
Logan Airport East Boston 02128	✓	
Logan Airport East Boston 02128	✓	
294 Bennington Street East Boston 02128	✓	

FSB: Full Service Branch

Year-Over-Year at a Glance

	1999	2000
HMDA Applications Received	184	220
HMDA Loans Originated	146	173
Low-Income Applications Received	15	23
Low-Income Loans Originated	11	17

Applications and originations for low-income mortgages at EBSB increased by over 60% from 1999 to 2000. HMDA loan applications and originations increased by roughly 20% in the same period.

⁴⁷ Based on most recent CRA Performance Evaluation by FDIC published 1999.

⁴⁸ Ibid.

**EBSB Appendix A****2000 Qualified Investments**

The following are the qualified investments made by East Boston Savings Bank in the year 2000:

Name	Description	Beneficiary	Type	Amount
Citizens for Adequate Housing	Affordable Housing	Low- Mod	Grant	\$550
Consumer Credit Counseling	Financial Education	Low- Mod	Grant	\$1,550
Crossroads Family	Family Shelter	Low- Mod	Grant	\$2,500
Deana's Fund	Relationship Violence Fund	Low- Mod	Grant	\$5,000
East Boston Social Center	New Joy Old Friends Program	Low- Mod	Grant	\$4,000
East Boston Social Center	Summer Youth Program	Low- Mod	Grant	\$5,000
E.B.R.A.C.	Summer Youth Program	Low- Mod	Grant	\$1,300
East Boston "K"	Local Scholarship	Low- Mod	Grant	\$300
Garfield Magnet School	Gators Global Reading Project	Low- Mod	Grant	\$100/school
Haven from Hunger	Hunger Relief Program	Low- Mod	Grant	\$5,000
Junior Achievement	Youth Initiative	Low- Mod	Grant	\$500
Narconon	Drug Awareness Education	Low- Mod	Grant	\$400
Neighborhood of Housing	Affordable Housing	Low- Mod	Grant	\$100
Revere 1 st	Elderly, Child & Family Services	Low- Mod	Grant	\$100
Roca, Inc.	Hunger Relief Project	Low- Mod	Grant	\$3,500
Savio Prep High School	Library Modernization	Low- Mod	Grant	\$6,741
Visiting Nurses Association	Support for Free	Low- Mod	Grant	\$4,000
Zumix	Art & Cultural Program	Low- Mod	Grant	\$500



Source Documents

Community Reinvestment Act Performance
Evaluation, Federal Deposit Insurance
Corporation; September 13, 1999.

Annual CRA Report to the Massachusetts
Commissioner of Banks, Commonwealth of
Massachusetts; 2000.

FFIEC HMDA Aggregate & Disclosure
Software Version 2.0, Board of the Governors of
the Federal Reserve System; 2000.

1999 Linked Deposit Report to the Mayor of the
City of Boston, NobleAssociates; June 2000.

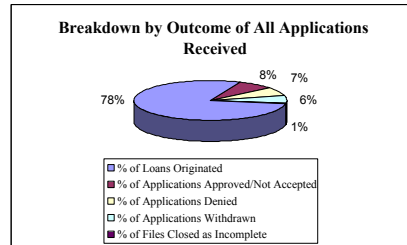
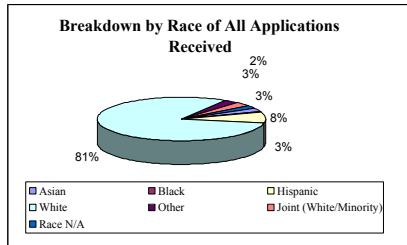
East Boston Savings Bank website
<http://www.ebsb.com/>

East Boston Savings Bank Lending Information - HMDA

2000

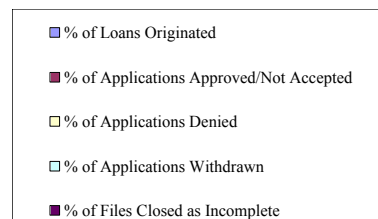
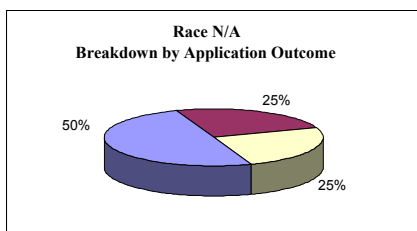
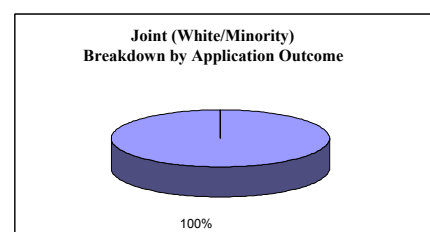
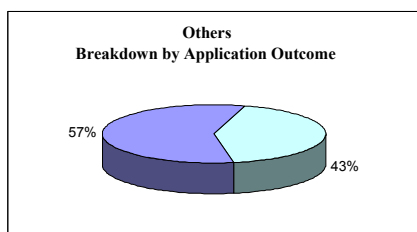
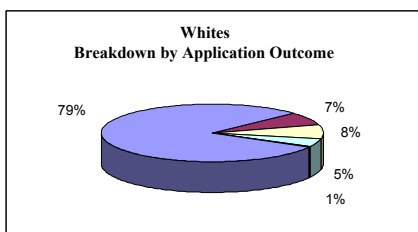
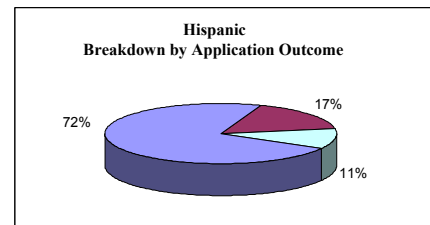
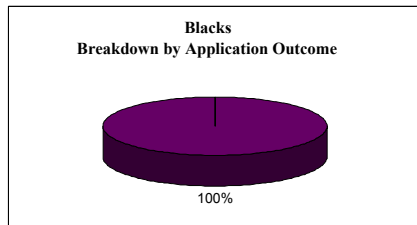
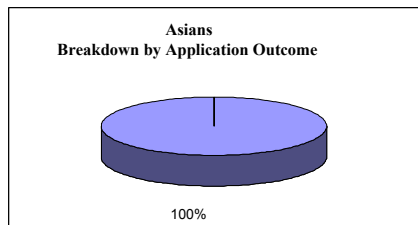
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	6	3%	6	100%	0	0%	0	0%	0	0%	0	0%
Black	1	0%	0	0%	0	0%	0	0%	0	0%	1	100%
Hispanic	18	8%	13	72%	3	17%	0	0%	2	11%	0	0%
White	177	80%	141	80%	13	7%	14	8%	8	5%	1	1%
Other	7	3%	4	57%	0	0%	0	0%	3	43%	0	0%
Joint (White/Minority)	7	3%	7	100%	0	0%	0	0%	0	0%	0	0%
Race N/A	4	2%	2	50%	1	25%	1	25%	0	0%	0	0%
Total	220	100%	173	79%	17	8%	15	7%	13	6%	2	1%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

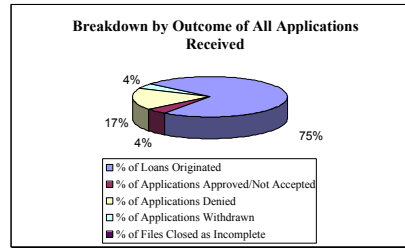
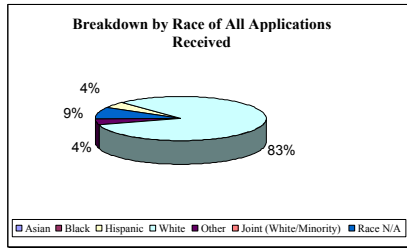


East Boston Savings Bank Low-Income Mortgage Information

2000

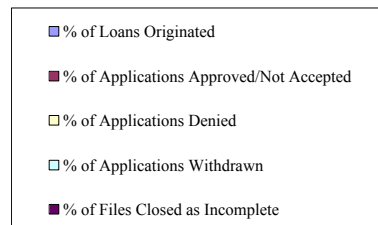
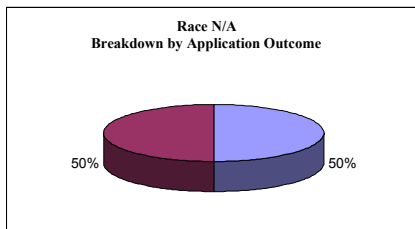
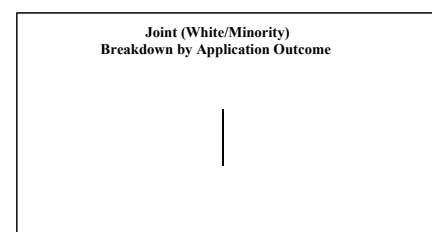
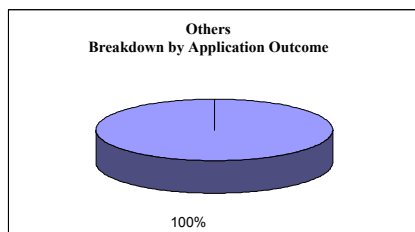
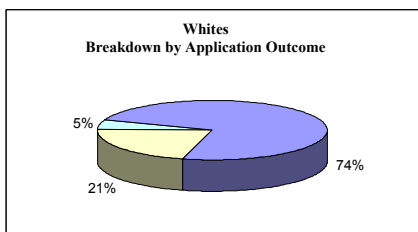
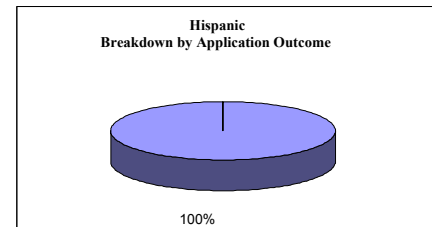
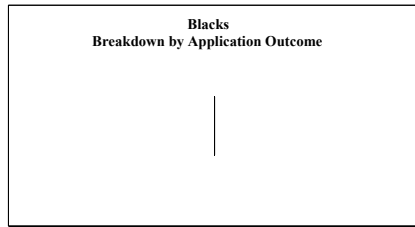
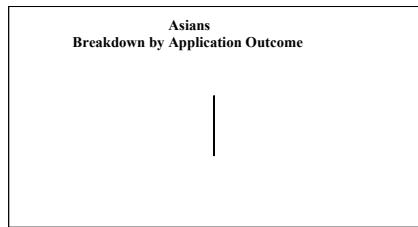
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Hispanic	1	4%	1	100%	0	0%	0	0%	0	0%	0	0%
White	19	83%	14	74%	0	0%	4	21%	1	5%	0	0%
Other	1	4%	1	100%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	2	9%	1	50%	1	50%	0	0%	0	0%	0	0%
Total	23	100%	17	74%	1	4%	4	17%	1	4%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.



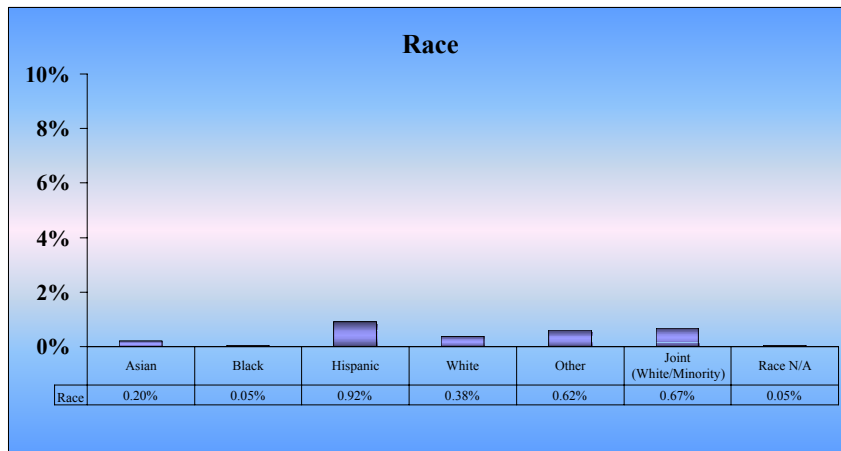
Compared against the MSA Aggregate Total

2000

East Boston Savings Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Asian	6	0.20%	6	0.27%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Black	1	0.05%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	1	1.61%
Hispanic	18	0.92%	13	1.00%	3	2.36%	0	0.00%	2	1.30%	0	0.00%
White	177	0.38%	141	0.39%	13	0.39%	14	0.38%	8	0.31%	1	0.18%
Other	7	0.62%	4	0.52%	0	0.00%	0	0.00%	3	4.29%	0	0.00%
Joint (White/Minority)	7	0.67%	7	0.84%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	4	0.05%	2	0.04%	1	0.12%	1	0.09%	0	0.00%	0	0.00%
Total	220	0.35%	173	0.37%	17	0.35%	15	0.25%	13	0.32%	2	0.22%

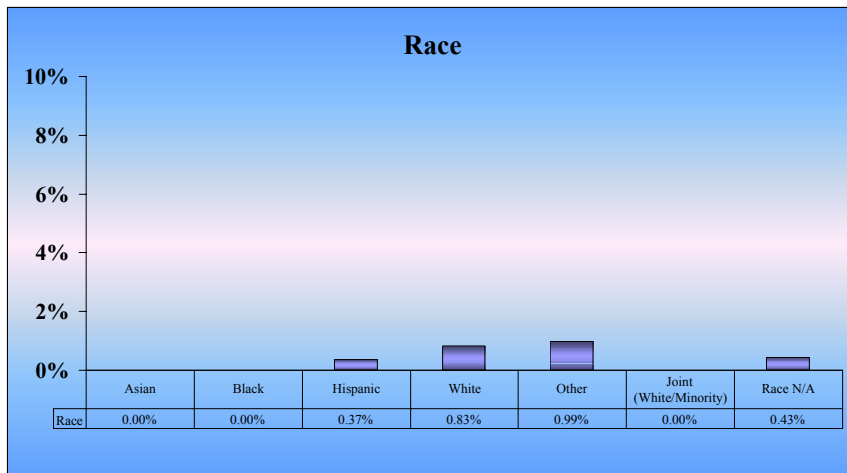
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



East Boston Savings Bank Low-Income Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Asian	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Black	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Hispanic	1	0.37%	1	0.56%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
White	19	0.83%	14	0.88%	0	0.00%	4	1.04%	1	0.67%	0	0.00%
Other	1	0.99%	1	1.56%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	2	0.43%	1	0.60%	1	2.70%	0	0.00%	0	0.00%	0	0.00%
Total	23	0.65%	17	0.75%	1	0.45%	4	0.61%	1	0.31%	0	0.00%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.





Employment Information

No data available

East Boston Savings Bank

Loan Information by Census Tract

[illegible]

MSA TOTAL										
LOAN ORIGINATED	85	81%	16116	89	77%	13206		33	75%	6337
APPROVED, NOT ACCEPTED	6	6%	805	13	11%	1582		4	9%	529
APP DENIED	6	6%	2037	7	6%	1265				
APP WITHDRAWN	6	6%	772	7	6%	1598		7	16%	1632
FILES CLOSED FOR INCOMPLETENESS	2	2%	278							

MA/SUFFOLK/0007.02

LOAN ORIGINATED	1	100%	124
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0008.02

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	2	100%	200	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/0104.01

LOAN ORIGINATED	1	100%	170
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

East Boston Savings Bank

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0104.02

LOAN ORIGINATED	1	100%	280
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0108.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	1	100%	285	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/0201.00

LOAN ORIGINATED							
APPROVED, NOT ACCEPTED							
APP DENIED							
APP WITHDRAWN	1	100%	900			1	100% 900
FILES CLOSED FOR INCOMPLETENESS							

MA/SUFFOLK/0304.00

LOAN ORIGINATED	1	100%	775
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

East Boston Savings Bank Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0305.00

LOAN ORIGINATED	1	100%	47
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0501.00

[illegible]

MA/SUFFOLK/0502.00

[illegible]

MA/SUFFOLK/0503.00

[illegible]

East Boston Savings Bank

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0512.00

LOAN ORIGINATED	3	75%	214	4	80%	553	2	67%	303
APPROVED, NOT ACCEPTED									
APP DENIED									
APP WITHDRAWN				1	20%	29	1	33%	29
FILES CLOSED FOR INCOMPLETENESS	1	25%	90						

MA/SUFFOLK/0604.00

LOAN ORIGINATED	1	100%	75
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0606.00

LOAN ORIGINATED	1	100%	264	1	100%	488	2	100%	752
APPROVED, NOT ACCEPTED									
APP DENIED									
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/0610.00

LOAN ORIGINATED	1	100%	169
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

East Boston Savings Bank

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0612.00

LOAN ORIGINATED							
APPROVED, NOT ACCEPTED							
APP DENIED							
APP WITHDRAWN	1	100%	399			1	100% 399
FILES CLOSED FOR INCOMPLETENESS							

MA/SUFFOLK/0706.00

LOAN ORIGINATED	2	100%	1810
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0707.00

LOAN ORIGINATED	1	50%	858
APPROVED, NOT ACCEPTED			
APP DENIED	1	50%	1114
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0712.00

LOAN ORIGINATED	1	100%	360
APPROVED, NOT ACCEPTED			
APP DENIED	1	100%	510
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

East Boston Savings Bank Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0809.00

LOAN ORIGINATED	2	100%	490	1	100%	300
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0813.00

LOAN ORIGINATED	1	100%	135	1	100%	135
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0921.00

LOAN ORIGINATED	1	100%	96	1	100%	295
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0922.00

LOAN ORIGINATED	1	100%	170
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

East Boston Savings Bank Loan Information by Census Tract

MA/SUFFOLK/1304.01

LOAN ORIGINATED	1	100%	295	1	100%	295
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1601.00

LOAN ORIGINATED	1	100%	94	1	100%	75	1	100%	94
APPROVED, NOT ACCEPTED									
APP DENIED									
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/1602.00

LOAN ORIGINATED	1	100%	110
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1605.00

LOAN ORIGINATED	2	100%	331	2	100%	331
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

East Boston Savings Bank Loan Information by Census Tract

MA/SUFFOLK/1704.00

LOAN ORIGINATED	2	67%	466	2	100%	210	2	100%	345
APPROVED, NOT ACCEPTED									
APP DENIED	1	33%	130						
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/1705.00

MA/SUFFOLK/1706.00

LOAN ORIGINATED	1	100%	87
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1707.00

LOAN ORIGINATED	4	80%	541	4	100%	783
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN	1	20%	116			
FILES CLOSED FOR INCOMPLETENESS						

East Boston Savings Bank

Loan Information by Census Tract

MA/SUFFOLK/1708.00

LOAN ORIGINATED	5	83%	1214	4	100%	361	2	100%	515
APPROVED, NOT ACCEPTED	1	17%	201						
APP DENIED									
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/1801.00

LOAN ORIGINATED	4	100%	216	4	100%	818
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1802.00

LOAN ORIGINATED	7	78%	1283	2	100%	322
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN	2	22%	266			
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1803.00

LOAN ORIGINATED	2	100%	260	1	50%	140				
APPROVED, NOT ACCEPTED				1	50%	225		1	100%	225
APP DENIED										
APP WITHDRAWN										
FILES CLOSED FOR INCOMPLETENESS										

East Boston Savings Bank

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1804.00

LOAN ORIGINATED	1	100%	96
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1805.00

LOAN ORIGINATED				4	100%	831
APPROVED, NOT ACCEPTED	1	100%	59			
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						



Eastern Bank

**Overview**

Eastern Bank & Trust
53 State Street
Boston, MA

Description

Eastern Bank, founded in 1818, is the fourth-largest full-service consumer bank in Greater Boston. Eastern Bank is a wholly-owned subsidiary of Eastern Bank Corporation. With \$4 billion in assets, Eastern Bank is headquartered in Boston and maintains regional offices in Lynn, Salem, Malden, Saugus and Quincy.

Principal Officers**CEO**

Stanley Lukowski
53 State Street
Boston, MA
617-263-2402

CFO

Bryan Texeira
1 Eastern Place
Lynn, MA
781-598-7831

Chief Compliance Officer

Kevin Shea
1 Eastern Place
Lynn, MA
781-598-8545

Employees

Number of Employees	1201
Number of Employees in Massachusetts	1201
Percentage of Women Employees	9%
Percentage of Minority Employees	12%

Branches

Number of Branches - Total	47
Branches within Boston PSMA	1
Number of ATMs	50
Number of Free Standing ATMs	4

CRA Rating

Rating Agency	FDIC
Most Recent Rating	1999
Overall Rating	SATISFACTORY⁴⁹
Lending Test Rating	HIGH
	SATISFACTORY
Investment Test Rating	LOW
	SATISFACTORY
Service Test Rating	OUTSTANDING

⁴⁹ Based on most recent CRA Performance Evaluation by FDIC published 1999.



Discussion

Overall rating: SATISFACTORY⁵⁰

Lending Test

Lending Test Rating: HIGH SATISFACTORY⁵¹

General Responsiveness to Credit Needs

As reported in the 1999 report, Eastern Bank sells the majority of its fixed rate mortgages on the secondary market. This caused a decline in Eastern Bank's residential loan portfolio.

The number of low-income mortgage applications dropped from 77 in 1999 to 51 in 2000.

Responsiveness to Low and Moderate-Income Credit Needs

According to the 1999 FDIC report, Eastern Bank's geographic distribution of both HMDA and small business loans reflects adequate distribution throughout the assessment area.

Although the distribution of loans throughout the low and moderate-income geographies is adequate, the number of loans in these areas is less favorable given the number of households in these areas. This may be due to low percentage of owner occupied homes (11.1% and 30.1%) in the particular tracts served by Eastern Bank. It was also reported that lending to borrowers residing in moderate-income tracts was low when compared with the number of households within those areas.

Leadership in Community Development Loans

In the 1999 FDIC report, the following were listed as Community Development Loans or Grants:

- South Boston Neighborhood House
- Massachusetts Affordable Housing Alliance
- NE Women's Leadership Awards
- Mass Mortgage Banker's Assoc.
- Arch Foundation
- Big Brother Association of Boston

⁵⁰ Based on most recent CRA Performance Evaluation published by FDIC 1999.

⁵¹ Ibid.

- Biomedical Science Careers Programs
- Community Servings
- Consumer Credit Counseling Service
- The Partnership
- South Boston Neighborhood House

Investment Test

Lending Test Rating: LOW SATISFACTORY⁵²

An adequate number of qualified, community development investments have been made. The qualified investments reflect a good responsiveness to credit and community economic development needs, based on numerous opportunities for such investments.

Service Test

Lending Test Rating: OUTSTANDING⁵³

Description Service Delivery Systems

Eastern Bank's delivery of retail services and management's commitment reflect a strong response to the assessment area.⁵⁴

Eastern Bank has 7 staff people available at their South Boston location, and 9 people available at their Federal Street office to service all Eastern Bank deposit or loan customers. Their Corporate Headquarters is based at 53 State Street, and the Commercial Lending Department is also housed at that location. Forty-two (42) members of the Commercial Lending group are also available to service Eastern Bank loan customers. The Direct Banking Center is available from 8:00 am to 8:00 pm at 1-800-EASTERN to facilitate any customer request or need. There are currently 55 people staffing the Direct Banking Center.

⁵² Based on most recent CRA Performance Evaluation by FDIC published 1999.

⁵³ Ibid.

⁵⁴ Ibid.



Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
101 Federal Street Boston, MA 02110	✓	✓
470 West Broadway S. Boston, MA 02127	✓	✓

FSB: Full Service Branch

Corporate Headquarters:

Exchange Place
53 State Street
Boston, MA 02109

Year-Over-Year at a Glance

	1999	2000
HMDA Applications Received	554	558
HMDA Loans Originated	437	459
Low-Income Applications Received	77	51
Low-Income Loans Originated	46	33

The number of low-income mortgage applications dropped from 77 in 1999 to 51 in 2000.



Source Documents

Community Reinvestment Act Performance
Evaluation, Federal Deposit Insurance
Corporation; August 16, 1999.

Annual CRA Report to the Massachusetts
Commissioner of Banks, Commonwealth of
Massachusetts; 2000.

FFIEC HMDA Aggregate & Disclosure
Software Version 2.0, Board of the Governors of
the Federal Reserve System; 2000.

1999 Linked Deposit Report to the Mayor of the
City of Boston, NobleAssociates; June 2000.

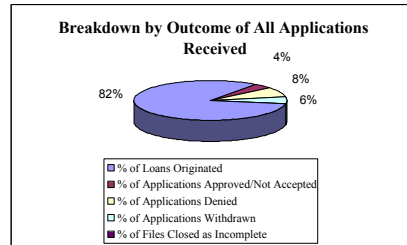
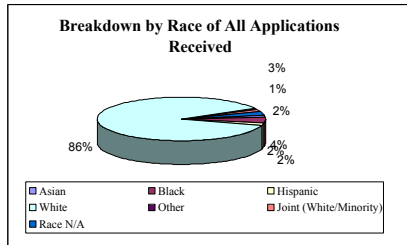
Eastern Bank website
<http://www.easternbank.com/>

Eastern Bank Lending Information - HMDA

2000

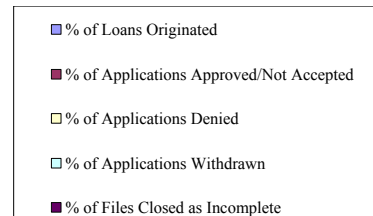
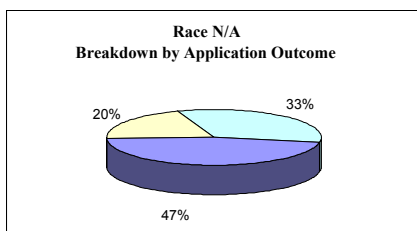
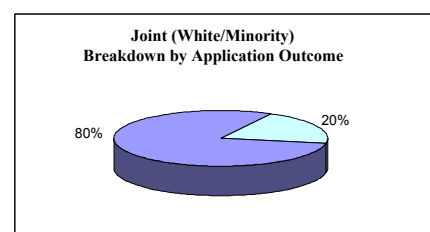
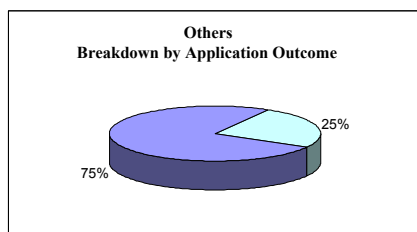
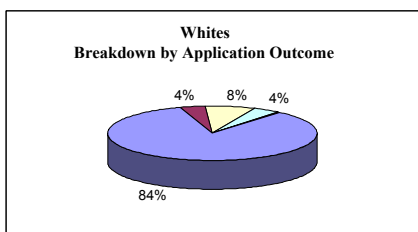
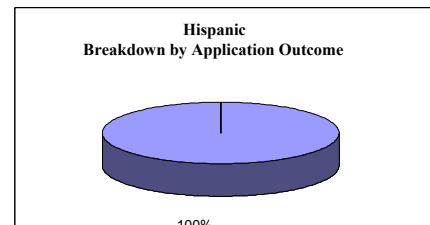
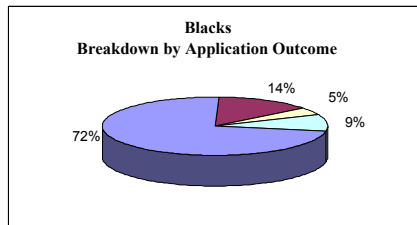
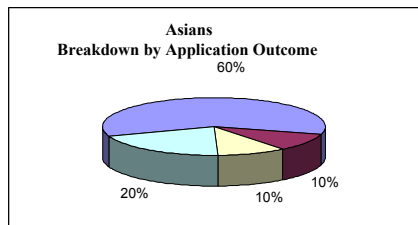
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	10	2%	6	60%	1	10%	1	10%	2	20%	0	0%
Black	22	4%	16	73%	3	14%	1	5%	2	9%	0	0%
Hispanic	10	2%	10	100%	0	0%	0	0%	0	0%	0	0%
White	487	87%	409	84%	19	4%	38	8%	19	4%	2	0%
Other	4	1%	3	75%	0	0%	0	0%	1	25%	0	0%
Joint (White/Minority)	10	2%	8	80%	0	0%	0	0%	2	20%	0	0%
Race N/A	15	3%	7	47%	0	0%	3	20%	5	33%	0	0%
Total	558	100%	459	82%	23	4%	43	8%	31	6%	2	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

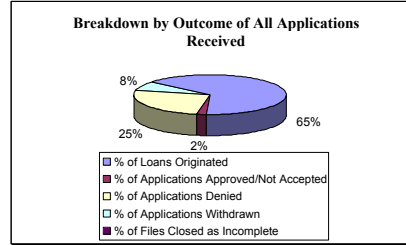
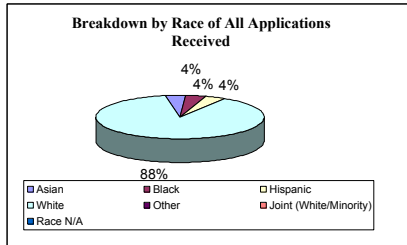


Eastern Bank Low-Income Mortgage Information

2000

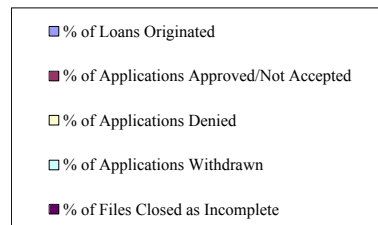
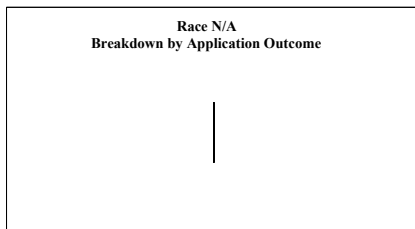
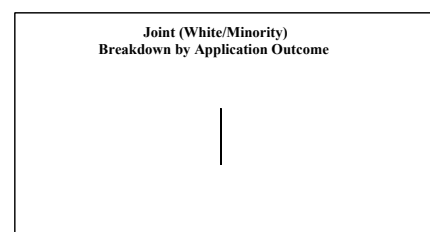
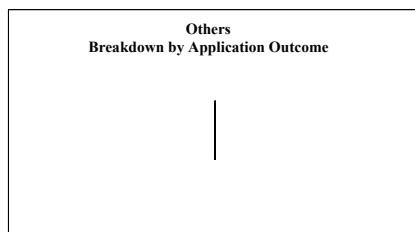
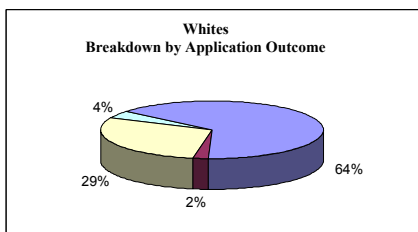
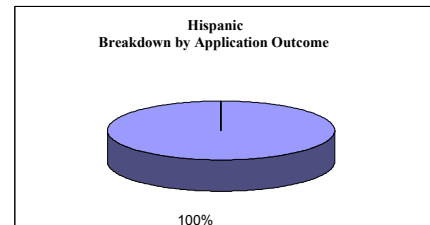
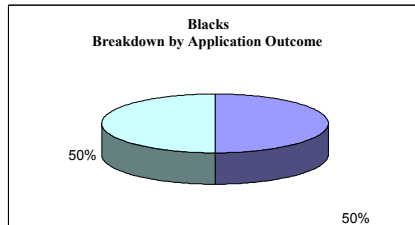
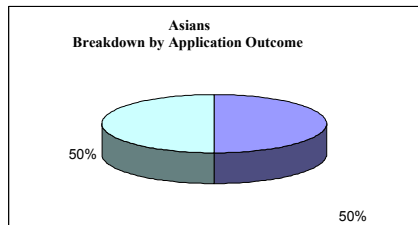
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	2	4%	1	50%	0	0%	0	0%	1	50%	0	0%
Black	2	4%	1	50%	0	0%	0	0%	1	50%	0	0%
Hispanic	2	4%	2	100%	0	0%	0	0%	0	0%	0	0%
White	45	88%	29	64%	1	2%	13	29%	2	4%	0	0%
Other	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	51	100%	33	65%	1	2%	13	25%	4	8%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.



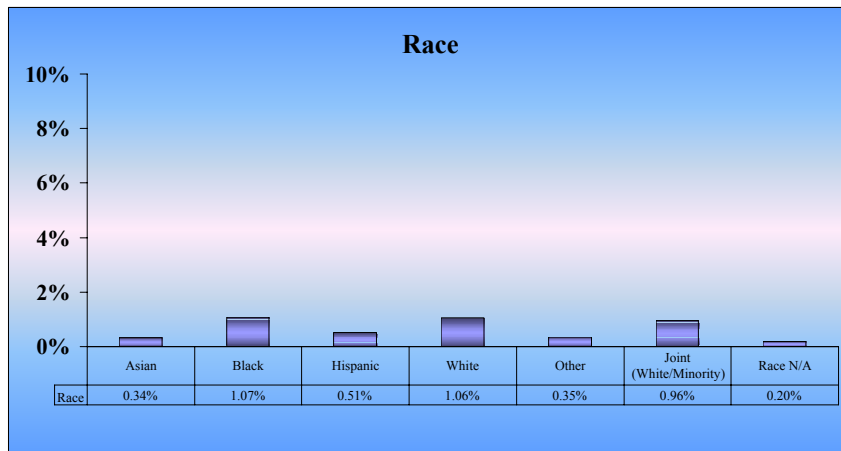
Compared against the MSA Aggregate Total

2000

Eastern Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Asian	10	0.34%	6	0.27%	1	0.45%	1	0.41%	2	1.16%	0	0.00%
Black	22	1.07%	16	1.29%	3	1.89%	1	0.23%	2	1.27%	0	0.00%
Hispanic	10	0.51%	10	0.77%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
White	487	1.06%	409	1.14%	19	0.58%	38	1.03%	19	0.75%	2	0.35%
Other	4	0.35%	3	0.39%	0	0.00%	0	0.00%	1	1.43%	0	0.00%
Joint (White/Minority)	10	0.96%	8	0.95%	0	0.00%	0	0.00%	2	3.51%	0	0.00%
Race N/A	15	0.20%	7	0.15%	0	0.00%	3	0.28%	5	0.52%	0	0.00%
Total	558	0.89%	459	0.98%	23	0.48%	43	0.72%	31	0.75%	2	0.22%

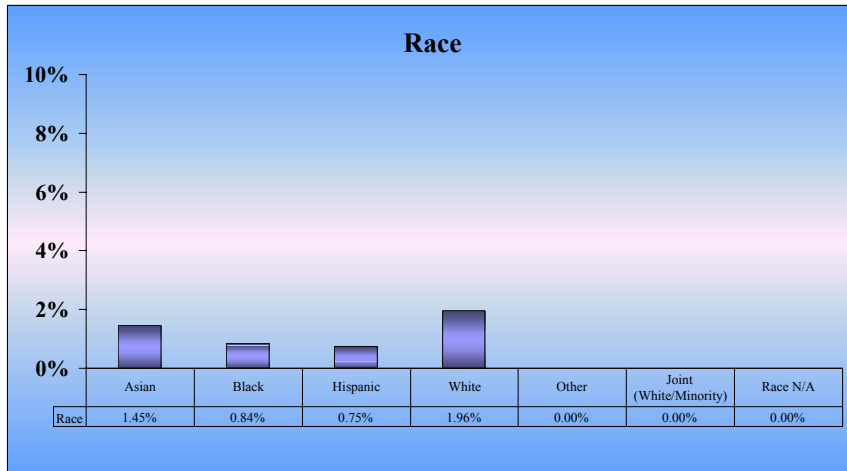
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Eastern Bank Low-Income Mortgage Information

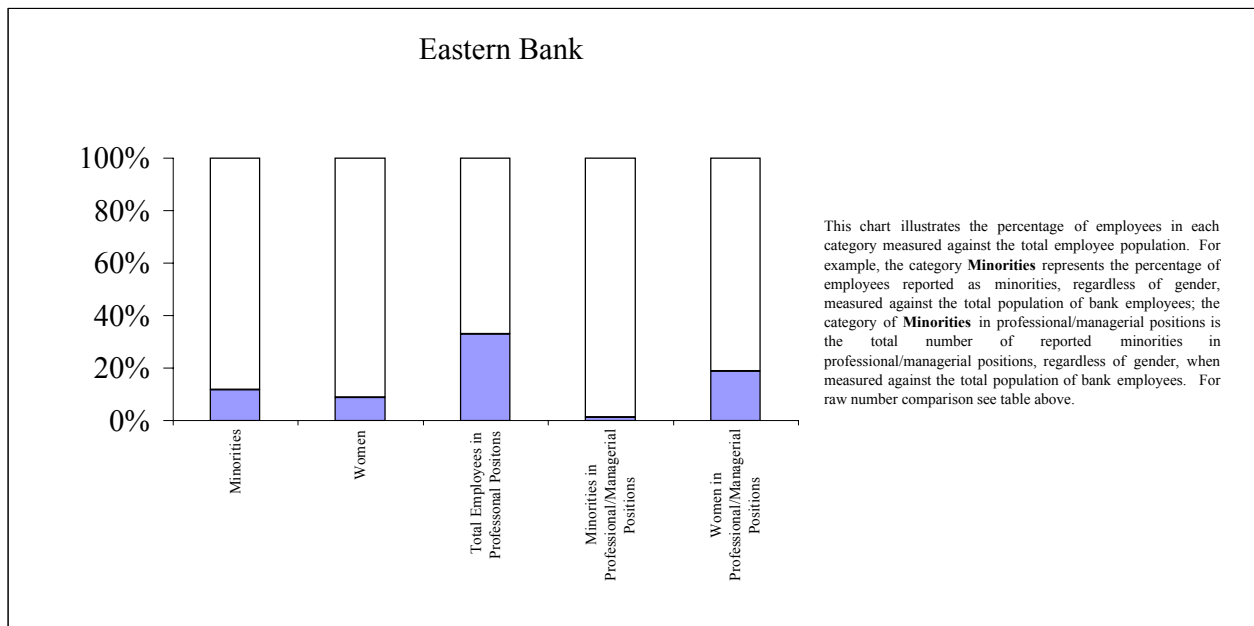
Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Asian	2	1.45%	1	1.01%	0	0.00%	0	0.00%	1	20.00%	0	0.00%
Black	2	0.84%	1	0.75%	0	0.00%	0	0.00%	1	4.76%	0	0.00%
Hispanic	2	0.75%	2	1.12%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
White	45	1.96%	29	1.82%	1	0.76%	13	3.37%	2	1.33%	0	0.00%
Other	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	51	1.44%	33	1.46%	1	0.45%	13	1.97%	4	1.25%	0	0.00%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Eastern Bank Employment Numbers

	Number of Employees	Percent of Total Employees
Total	1201	
Minorities	140	12%
Women	105	9%
Total Employees In Professional Positions	394	33%
Minorities in Professional or Managerial Positions	15	1%
Women in Professional or Managerial Positions	225	19%



Eastern Bank

Loan Information by Census Tract

[illegible]

Eastern Bank

Loan Information by Census Tract

MA/SUFFOLK/0101.02

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	1	100%	6	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/0105.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED				
APP WITHDRAWN	1	100%	8500	
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/0106.00

LOAN ORIGINATED	1	100%	1350
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0107.00

LOAN ORIGINATED	1	100%	260	1	100%	1500
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Eastern Bank

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0108.00

LOAN ORIGINATED	4	100%	1378	1	100%	325
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0201.00

[illegible]

MA/SUFFOLK/0202.00

LOAN ORIGINATED	1	100%	250
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0203.00

LOAN ORIGINATED	1	100%	130	1	100%	25
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Eastern Bank

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0301.00

LOAN ORIGINATED	1	100%	475
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0302.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	1	100%	600	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/0305.00

LOAN ORIGINATED	1	100%	500
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0403.00

LOAN ORIGINATED	1	100%	346
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Eastern Bank

Loan Information by Census Tract

MA/SUFFOLK/0404.00

LOAN ORIGINATED			
APPROVED, NOT ACCEPTED	1	100%	50
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0502.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	1	100%	125	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/0503.00

LOAN ORIGINATED	1	100%	129
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0505.00

LOAN ORIGINATED	1	100%	88	1	100%	8
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Eastern Bank

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0506.00

LOAN ORIGINATED	1	100%	188
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0510.00

LOAN ORIGINATED	2	100%	1380
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0511.00

LOAN ORIGINATED	2	100%	294	2	100%	105
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0601.00

LOAN ORIGINATED	2	100%	412
APPROVED, NOT ACCEPTED			
APP DENIED	2	100%	340
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Eastern Bank

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																				
Home Purchase Loans															Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans											
A			B			C			D			E			& E					
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's			
			1	100%	190	1	100%	110												
			1	100%	279	3	100%	466							1	100%	205			
						2	100%	236												
			4	80%	840	4	100%	470							2	100%	240			
			1	20%	220															

Eastern Bank

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans												Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans								
A			B			C			D			E			& E		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's
						5	83%	607							1	50%	80
			1	100%	264	1	17%	75							1	50%	264
						5	100%	917							3	100%	543
						1	100%	50									
						2	100%	425							2	100%	425
									1	100%	25						

Eastern Bank

Loan Information by Census Tract

Eastern Bank

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0707.00

LOAN ORIGINATED	1	100%	200
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0708.00

LOAN ORIGINATED	1	100%	120
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0709.00

LOAN ORIGINATED	1	100%	275	1	100%	275
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0710.00

LOAN ORIGINATED	1	100%	150
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Eastern Bank

Loan Information by Census Tract

MA/SUFFOLK/0810.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED				
APP WITHDRAWN	1	100%	1300	
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/0812.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED				
APP WITHDRAWN	1	100%	239	
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/0815.00

LOAN ORIGINATED	1	100%	90
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0903.00

LOAN ORIGINATED	2	100%	152
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Eastern Bank

Loan Information by Census Tract

MA/SUFFOLK/1006.02

LOAN ORIGINATED	2	100%	209
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1007.00

LOAN ORIGINATED	1	100%	239			
APPROVED, NOT ACCEPTED						
APP DENIED				1	100%	650
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1010.02

LOAN ORIGINATED	1	50%	227
APPROVED, NOT ACCEPTED			
APP DENIED	1	50%	227
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1203.00

LOAN ORIGINATED	1	100%	100
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Eastern Bank

Loan Information by Census Tract

MA/SUFFOLK/1205.00

LOAN ORIGINATED						
APPROVED, NOT ACCEPTED						
APP DENIED	1	100%	400		1	100% 400
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1304.01

LOAN ORIGINATED	1	100%	131
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1304.02

LOAN ORIGINATED	1	100%	212
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1402.00

LOAN ORIGINATED	1	100%	137	1	100%	500
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Eastern Bank

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1403.00

LOAN ORIGINATED	1	100%	30
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1404.00

LOAN ORIGINATED	1	100%	60	1	100%	272
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN	1	100%	160			
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1602.00

LOAN ORIGINATED	1	100%	119
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN	1	100%	160
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1603.00

LOAN ORIGINATED	1	100%	127
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Eastern Bank

Loan Information by Census Tract

MA/SUFFOLK/1701.00

LOAN ORIGINATED	1	100%	90
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN	1	100%	40
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1702.00

LOAN ORIGINATED	1	100%	256			
APPROVED, NOT ACCEPTED						
APP DENIED				1	50%	60
APP WITHDRAWN				1	50%	13
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1703.00

[illegible]

MA/SUFFOLK/1704.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	1	100%	20	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

Eastern Bank

Loan Information by Census Tract

[illegible]

Eastern Bank

Loan Information by Census Tract

MA/SUFFOLK/1801.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED				
APP WITHDRAWN	1	100%	40	
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/1803.00

LOAN ORIGINATED	1	100%	48
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			



Fleet Bank



Overview

FleetBoston Financial
100 Federal Street
Boston, MA 02106

Description

FleetBoston Financial is the seventh-largest financial holding company in the United States, with assets exceeding \$200 billion. Fleet serves 20 million customers in more than 20 countries and territories. In 2000, Fleet completed the largest branch divestiture in US history with the sale of over 280 branches to Sovereign Bancorp and other banking institutions. Of this, total over 200 branches were in Massachusetts.

Principal Officers

Chairman

Terrance Murray
100 Federal Street
Boston, MA
617-434-2200

President and CEO

Charles Gifford
100 Federal Street
Boston, MA
617-434-2200

Chief Compliance Officer

Mr. Paul Hogan
100 Federal Street
Boston, MA
617-434-2200

Employees

Number of Employees	52,500
Number of Employees in Massachusetts	NA
Percentage of Women Employees	71%
Percentage of Minority Employees	26%

Branches

Number of Branches - Total	1500
Branches within Boston PSMA	31
Number of ATMs	3700
Number of Free Standing ATMs	4 in MSA

CRA Rating

Rating Agency	Office of the Comptroller of the Currency
Most Recent Rating	1998
Overall Rating	SATISFACTORY ⁵⁵
Lending Test Rating	HIGH SATISFACTORY ⁵⁶
Investment Test Rating	OUTSTANDING ⁵⁷
Service Test Rating	LOW SATISFACTORY ⁵⁸

⁵⁵ Based on most recent CRA Performance Evaluation by OCC published 1998

⁵⁶ Ibid.

⁵⁷ Ibid.

⁵⁸ Ibid.



Discussion

Overall rating: SATISFACTORY⁵⁹

Lending Test

Lending Test Rating: HIGH SATISFACTORY⁶⁰

General Responsiveness to Credit Needs

During the period reviewed by the OCC, Fleet Bank made 11,596 residential, real estate loans. The bank also made 10 community-development loans, which totaled \$98 million.

Responsiveness to Low and Moderate-Income Credit Needs

Fleet Bank was the second largest HMDA lender. By individual HMDA products, Fleet Bank ranked second in the number of home purchase and improvement loans and first in refinances.

Fleet Bank's distribution of HMDA loans in the Boston MSA was strong. In total, 2% and 19% of the Fleet Bank's HMDA loans were in the low and moderate-income geographies, respectively.

Fleet Bank has a much larger market share in low and moderate-income census tracts than in middle and upper-income tracts.

Fleet Bank's market share for low-income geographies was 4.00 times the overall market share, and was 2.01 times the overall market share for moderate-income geographies.

Fleet Bank originated more HMDA related loans to low and moderate-income borrowers during 1996.

- 1996 – Fleet Bank made 9% and 22% of their HMDA loans to low and moderate-income individuals, respectively.

Fleet's HMDA loans increased from 1,046 in 1999 to 2473 in 2000. During that same period, applications denied also grew from 123 across all ethnic groups to 542.

For that same period, low-income applications increased by 53, yet the number of low-income loans originated grew by only one.

Leadership in Community Development Loans

During the period reviewed by the OCC, Fleet Bank originated ten community-development loans, which totaled \$98.5 million.

Four of these loans, totaling \$79 million, were used for bridge financing for low-income housing tax credits.

Investment Test

Investment Test Rating: OUTSTANDING⁶¹

Fleet Bank's investment level in this MSA is consistent with the overall level of investments in the state. Before the period evaluated, Fleet Bank purchased 27,000 shares of common and preferred stock in a local, minority-owned, community-development, financial institution.

Service Test

Service Test Rating: LOW SATISFACTORY⁶²

Description Service Delivery Systems

Community development services are formally provided through homebuyer seminars, at which bank personnel discuss the loan application and home purchase process for low and moderate-income, first-time homebuyers.

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
Head Office Boston, MA	✓	✓
Uphams Corner Boston, MA	✓	✓
Fields Corner Boston, MA	✓	✓
Hyde Park Street Boston, MA	✓	✓
Roslindale Street Boston, MA	✓	✓

⁵⁹ Based on most recent CRA Performance Evaluation by OCC published 1998

⁶⁰ Ibid.

⁶¹ Ibid.

⁶² Ibid.



City of Boston 2000 Linked Deposit Banking Report to the Mayor

Brighton Avenue	✓	✓	1236A Commonwealth Ave.	✓
Boston, MA			Boston, MA	
Berkeley Street	✓	✓	186 Brighton Avenue	✓
Boston, MA			Boston, MA	
Park Street	✓	✓	401 Washington Street	✓
Boston, MA			Boston, MA	
Chinatown	✓	✓	957 Commonwealth Ave.	✓
Boston, MA			Boston, MA	
Codman Square	✓	✓	1237 Commonwealth Ave.	✓
Boston, MA			Boston, MA	
South Boston	✓	✓	660 Beacon Street	✓
Boston, MA			Boston, MA	
State Street	✓	✓	881 Commonwealth Ave.	✓
Boston, MA			Boston, MA	
Brigham Circle	✓	✓	771 Commonwealth Ave.	✓
Boston, MA			Boston, MA	
Jamaica Plain	✓	✓	700 Commonwealth Ave.	✓
Boston, MA			Boston, MA	
West Roxbury	✓	✓	82 East Concord Street	✓
Boston, MA			Boston, MA	
Dudley Street	✓	✓	Western Ave.	✓
Boston, MA			Boston, MA	
Springhouse Rd	✓	✓	540 Commonwealth Ave	✓
Boston, MA			Boston, MA	
3 Center Plaza	✓	✓	354 Chestnut Hill Ave.	✓
Boston, MA			Boston, MA	
Canal Street	✓	✓	942 Hyde Park Avenue	✓
Boston, MA			Boston, MA	
Boylston Street	✓	✓	(Flanagan's Market)	
Boston, MA			9-15 Poplar Street	✓
Mattapan	✓	✓	Boston, MA	
Boston, MA			1665 VFW Parkway	✓
Hyde Park	✓	✓	Boston, MA	
Boston, MA			175 Federal Street	✓
South Bay Rd	✓	✓	Boston, MA	
Boston, MA			One Post Office Square	✓
South End	✓	✓	Boston, MA	
Boston, MA			125 High Street	✓
Longwood Ave	✓	✓	Boston, MA	
Boston, MA			285 Huntington Ave	✓
Copley Square	✓	✓	Boston, MA	
Boston, MA			315 Washington Street	✓
CityPlace	✓	✓	Boston, MA	
Boston, MA			6 Tremont Street	✓
Exeter Place	✓	✓	Boston, MA	
Boston, MA			65 Franklin Street	✓
Mass. Avenue	✓	✓	Boston, MA	
Boston, MA			157 Stuart Street	✓
Grove Hall	✓	✓	Boston, MA	
Boston, MA			557 Boylston Street	✓
University Square	✓	✓	Boston, MA	
Boston, MA			699 Boylston Street	✓
58 Winter Street	✓		Boston, MA	
Boston, MA			333 Longwood Avenue	✓
149 Navy Yard	✓		Boston, MA	
Boston, MA			557-569A Tremont Street	✓
736 Cambridge St.	✓		Boston, MA	
Brighton, MA			1515 Dorchester Avenue	✓
1650 Soldiers Field Road	✓		Boston, MA	
Boston, MA				



125 Parker Hill Avenue Boston, MA	✓	114 Dudley Street Boston, MA	✓
One Deaconess Road Boston, MA	✓	1219 River Street Boston, MA	✓
171 Harrison Avenue Boston, MA	✓	133 Massachusetts Ave. Boston, MA	✓
265 Franklin Street Boston, MA	✓	1440 Dorchester Ave Boston, MA	✓
31 St. James Avenue Boston, MA	✓	161 Cambridge Street Boston, MA	✓
300 The Fenway Boston, MA	✓	1857 Centre Street West Roxbury, MA	✓
181 Cambridge Street Boston, MA	✓	210 Berkeley Street Boston, MA	✓
150 South Huntington Boston, MA	✓	29 Corinth Street Boston, MA	✓
550 Huntington Avenue Boston, MA	✓	3 Centre Plaza Boston, MA	✓
599 Washington Street Boston, MA	✓	350 Chestnut Hill Ave. Boston, MA	✓
1146 Blue Hill Avenue Boston, MA	✓	410 Brookline Avenue Boston, MA	✓
1 Summer Street Boston, MA	✓	5 Chestnut Hill Ave. Boston, MA	✓
1035 Truman Highway Boston, MA	✓	60 State Street Boston, MA	✓
MBTA Jamaica Plain Boston, MA	✓	677 Centre Street Jamaica Plain, MA	✓
950 American Legion Hwy Boston, MA	✓	710 Washington Street Boston, MA	✓
51 Warren Street Boston, MA	✓	855 Boylston Street Boston, MA	✓
Tremont Street Boston, MA	✓	2100 Dorchester Avenue Boston, MA	✓
249 Ruggles Street Boston, MA	✓	621 Huntington Avenue Boston, MA	✓
Emerson College Boston, MA	✓	32 Fruit Street Boston, MA	✓
30 Rowes Wharf Boston, MA	✓	179 Longwood Avenue Boston, MA	✓
255 Northern Avenue Boston, MA	✓	730 Atlantic Avenue Boston, MA	✓
221 Mass. Avenue Boston, MA	✓	830 Washington Street Boston, MA	✓
1230 VFW Parkway Boston, MA	✓	740 Gallivan Blvd. Boston, MA	✓
360 Huntington Ave. Boston, MA	✓	775 Commonwealth Ave. Boston, MA	✓
301 Centre Street Boston, MA	✓	1154 Centre Street Boston, MA	✓
545 Freeport Street Boston, MA	✓	400 Atlantic Avenue Boston, MA	✓
616 Washington Street Boston, MA	✓	First Avenue, Bldg. 34 Boston, MA	✓
283 Causeway Street Boston, MA	✓	618 Washington Street Boston, MA	✓
101 Huntington Avenue Boston, MA	✓	555 Columbia Road Boston, MA	✓
100 Federal Street Boston, MA	✓	Harbor Campus Boston, MA	✓



636 East Broadway ✓
 Boston, MA
 260 Hanover Street ✓
 Boston, MA
 104 Canal Street ✓
 Boston, MA
 1610 Tremont Street ✓
 Boston, MA
 100 River Street ✓
 Boston, MA
 Two Fenway Plaza ✓
 Boston, MA
 569 Huntington Avenue ✓
 Boston, MA
 483 Blue Hill Avenue ✓
 Boston, MA
 745 Boylston Street ✓
 Boston, MA
 1762 Washington Street ✓
 Boston, MA
 200 Clarendon Avenue ✓
 Boston, MA
 364 Brookline Avenue ✓
 Boston, MA
 0 Post Office Square ✓
 Boston, MA
 90 Mass. Avenue ✓
 Boston, MA
 110 Huntington Avenue ✓
 Boston, MA
 243 Charles Street ✓
 Boston, MA
 1 Gillette Park ✓
 Boston, MA
 985 American Legion Hwy ✓
 Boston, MA
 1 Harborside Drive ✓
 Boston, MA
 Logan Int'l Airport Term E ✓
 Boston, MA
 Logan Int'l Airport Term C ✓
 Boston, MA
 Logan Int'l Airport Term A ✓
 Boston, MA
 60 Everett Street ✓
 Boston, MA (Stop & Shop)
 400 Western Avenue ✓
 Boston, MA
 460 West Broadway ✓
 Boston, MA
 100 Morrissey Blvd ✓
 Boston, MA (bldg 1)
 100 Morrissey Blvd ✓
 Boston, MA (bldg 2)
 75 Francis Street ✓
 Boston, MA
 630 Washington Street ✓
 Boston, MA
 One Financial Center ✓
 Boston, MA (Starbucks)

88 East Newton Street ✓
 Boston, MA
 150 Mt. Vernon Street ✓
 Boston, MA
 125 Nashua Street ✓
 Boston, MA
 290 Northern Avenue ✓
 Boston, MA (Fleet
 Pavilion)
 330 Brookline Avenue ✓
 Boston, MA
 Logan- Terminal ✓
 Boston, MA
 Fleet Center ✓
 Boston, MA
 175 Berkeley Street ✓
 Boston, MA
 529 Main Street ✓
 Charlestown, MA
 66 Thomson Place ✓
 Boston, MA
 FSB: Full Service Branch

Additional Information

In July of 2000, Fleet completed the largest divestiture in banking history. 290 branches in New England were sold to Sovereign, Citizens Bank, Cape Cod Bank and Trust and several other institutions.

Year-Over-Year at a Glance

	1999	2000
HMDA Applications Received	1046	2473
HMDA Loans Originated	831	1677
Low-Income Applications Received	242	295
Low-Income Loans Originated	190	191

Fleet's HMDA loans increased from 1,046 in 1999 to 2473 in 2000. During that same period, applications denied also grew from 123 across all ethnic groups to 542.

For that same period, the number of low-income loans originated grew by one (1) despite an increase in the number of applications



Source Documents

Community Reinvestment Act Performance
Evaluation, Office of the Comptroller of the
Currency; February 23, 1998.

FFIEC HMDA Aggregate & Disclosure
Software Version 2.0, Board of the Governors of
the Federal Reserve System; 2000.

1999 Linked Deposit Report to the Mayor of the
City of Boston, NobleAssociates; June 2000.

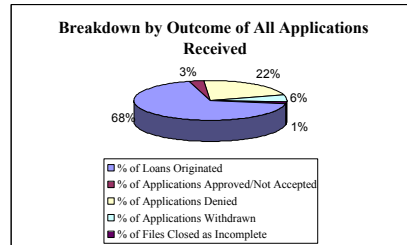
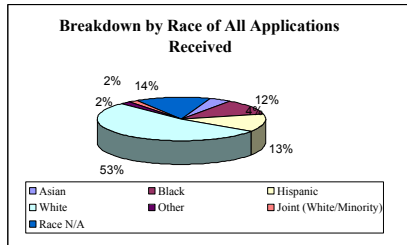
Fleet Bank website
<http://www.fleet.com/home.asp>

Fleet Bank Lending Information - HMDA

2000

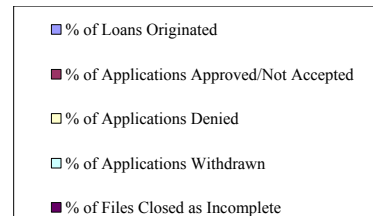
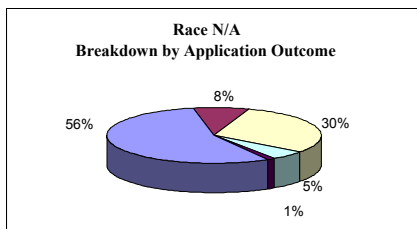
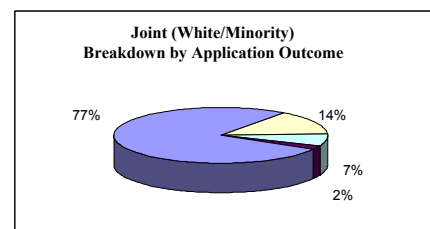
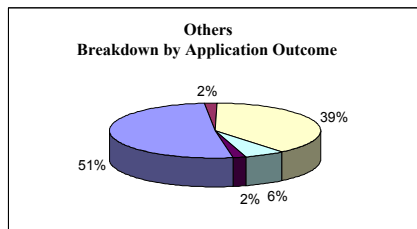
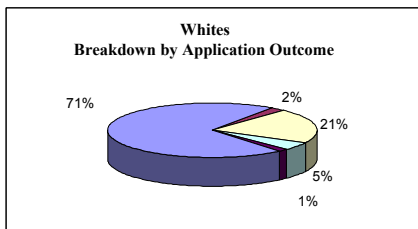
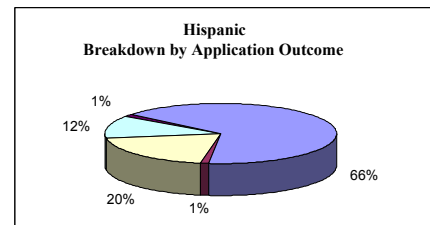
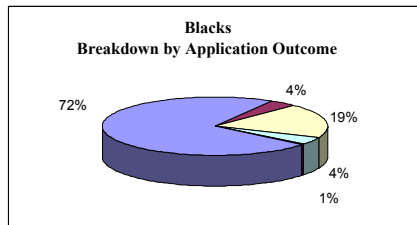
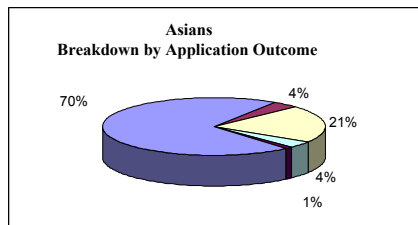
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	101	4%	71	70%	4	4%	21	21%	4	4%	1	1%
Black	292	12%	211	72%	11	4%	56	19%	12	4%	2	1%
Hispanic	319	13%	209	66%	4	1%	63	20%	39	12%	4	1%
White	1313	53%	931	71%	29	2%	270	21%	64	5%	19	1%
Other	49	2%	25	51%	1	2%	19	39%	3	6%	1	2%
Joint (White/Minority)	43	2%	33	77%	0	0%	6	14%	3	7%	1	2%
Race N/A	356	14%	197	55%	29	8%	107	30%	19	5%	4	1%
Total	2473	100%	1677	68%	78	3%	542	22%	144	6%	32	1%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

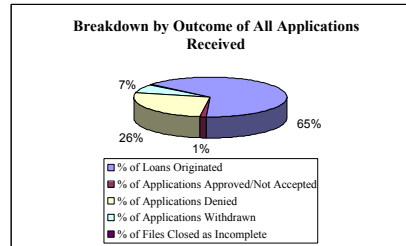
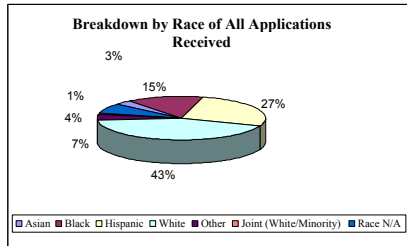


Fleet Bank Low-Income Mortgage Information

2000

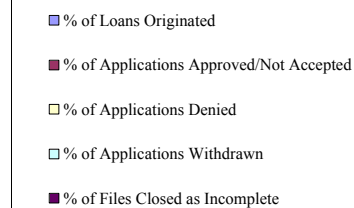
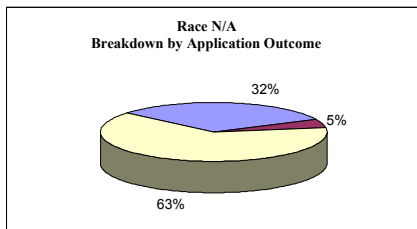
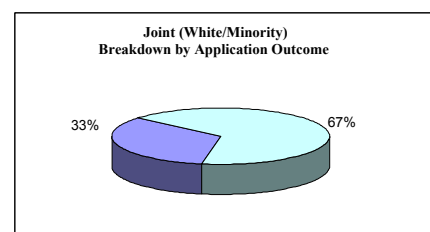
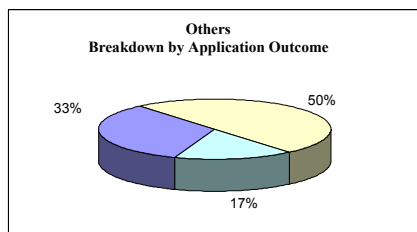
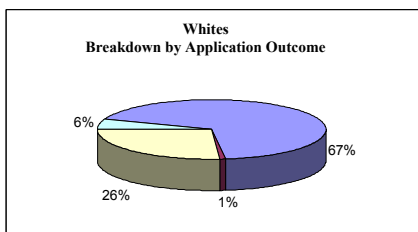
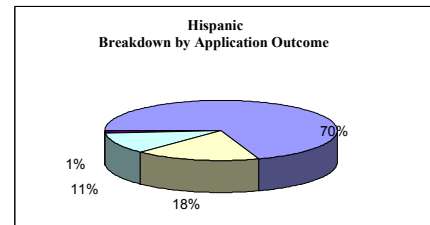
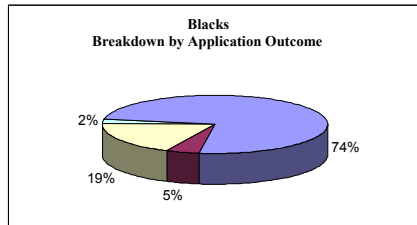
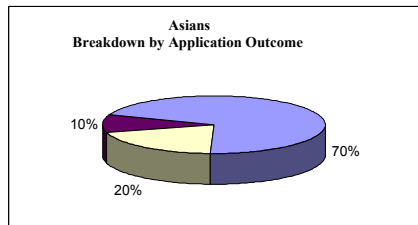
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	10	3%	7	70%	0	0%	2	20%	0	0%	1	10%
Black	43	15%	32	74%	2	5%	8	19%	1	2%	0	0%
Hispanic	79	27%	55	70%	0	0%	14	18%	9	11%	1	1%
White	126	43%	85	67%	1	1%	33	26%	7	6%	0	0%
Other	12	4%	4	33%	0	0%	6	50%	2	17%	0	0%
Joint (White/Minority)	3	1%	1	33%	0	0%	0	0%	2	67%	0	0%
Race N/A	22	7%	7	32%	1	5%	14	64%	0	0%	0	0%
Total	295	100%	191	65%	4	1%	77	26%	21	7%	2	1%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.



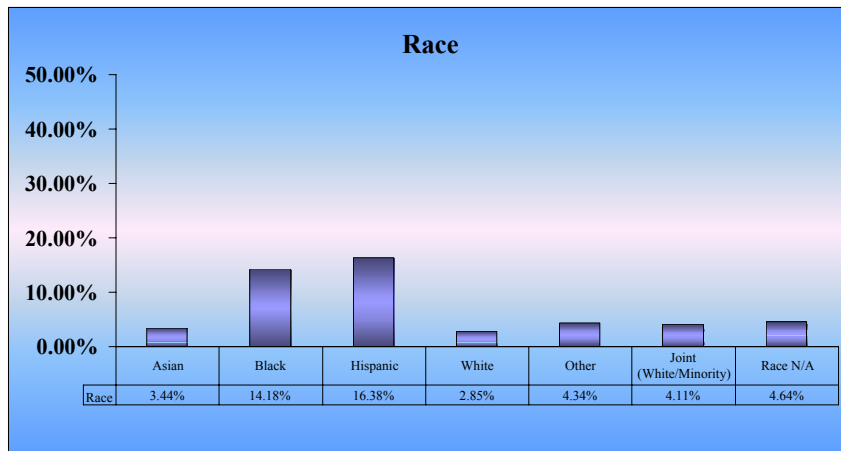
Compared against the MSA Aggregate Total

2000

Fleet Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Asian	101	3.44%	71	3.15%	4	1.79%	21	8.54%	4	2.31%	1	2.33%
Black	292	14.18%	211	17.06%	11	6.92%	56	12.64%	12	7.59%	2	3.23%
Hispanic	319	16.38%	209	16.09%	4	3.15%	63	19.03%	39	25.32%	4	11.11%
White	1313	2.85%	931	2.59%	29	0.88%	270	7.33%	64	2.51%	19	3.35%
Other	49	4.34%	25	3.24%	1	0.89%	19	12.10%	3	4.29%	1	5.26%
Joint (White/Minority)	43	4.11%	33	3.94%	0	0.00%	6	8.57%	3	5.26%	1	6.67%
Race N/A	356	4.64%	197	4.22%	29	3.51%	107	9.96%	19	1.98%	4	2.65%
Total	2473	3.94%	1677	3.57%	78	1.62%	542	9.03%	144	3.49%	32	3.58%

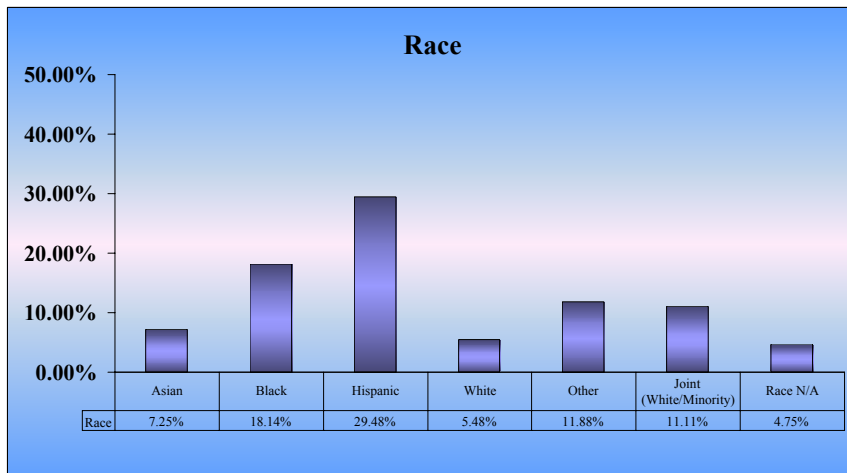
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Fleet Bank Low-Income Mortgage Information

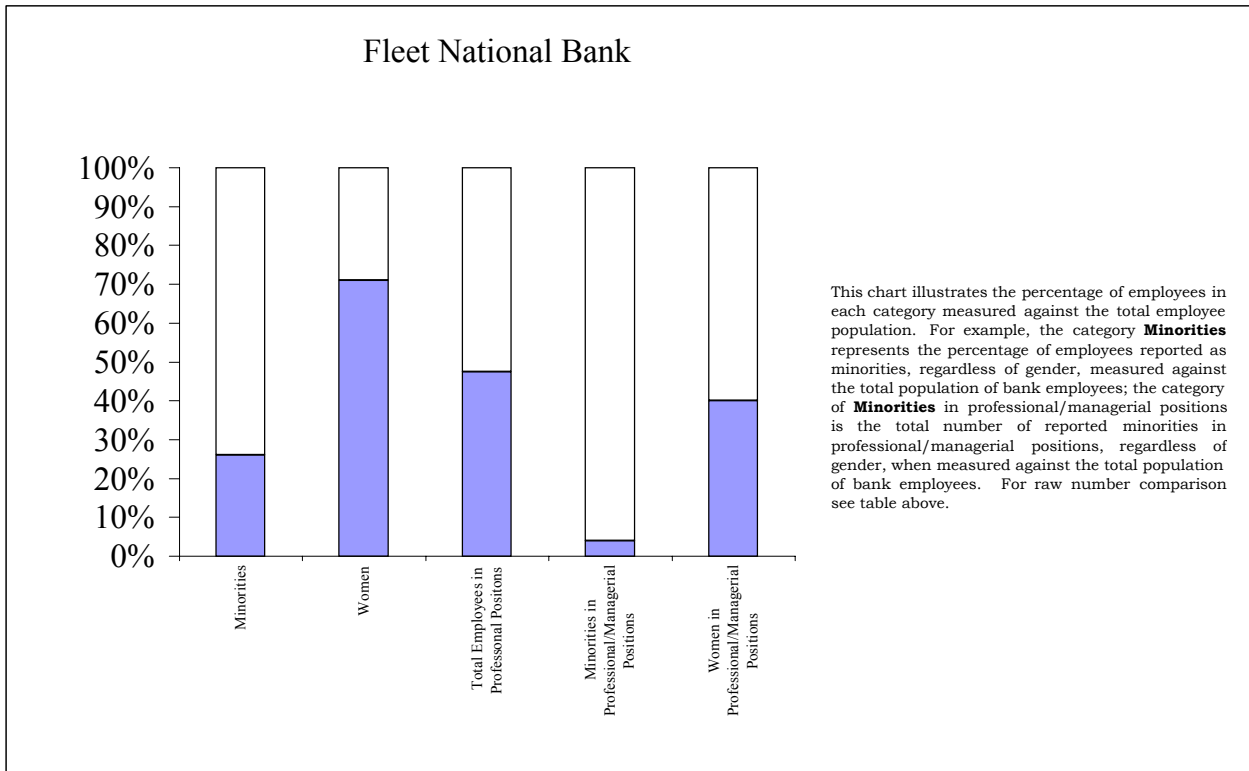
Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Asian	10	7.25%	7	7.07%	0	0.00%	2	11.11%	0	0.00%	1	25.00%
Black	43	18.14%	32	23.88%	2	14.29%	8	15.09%	1	4.76%	0	0.00%
Hispanic	79	29.48%	55	30.73%	0	0.00%	14	29.79%	9	42.86%	1	20.00%
White	126	5.48%	85	5.33%	1	0.76%	33	8.55%	7	4.67%	0	0.00%
Other	12	11.88%	4	6.25%	0	0.00%	6	31.58%	2	66.67%	0	0.00%
Joint (White/Minority)	3	11.11%	1	5.26%	0	0.00%	0	0.00%	2	50.00%	0	0.00%
Race N/A	22	4.75%	7	4.17%	1	2.70%	14	10.29%	0	0.00%	0	0.00%
Total	295	8.35%	191	8.46%	4	1.79%	77	11.65%	21	6.56%	2	2.86%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Fleet National Bank Employment Numbers

	Number of Employees	Percent of Total Employees
Total	52,550	
Minorities	13,663	26%
Women	37,310	71%
Total Employees In Professional Positions	24,961	47%
Minorities in Professional or Managerial Positions	2,036	4%
Women in Professional or Managerial Positions	21,080	40%



Fleet National Bank Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings													Loans on Dwellings for 5 or more families						Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
Home Purchase Loans																					
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans												
A			B			C			D			E			& E						
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's				
45	63%	8891	534	67%	96884	437	50%	38089	411	42%	19678				52	40%	7339				
1	1%	173	21	3%	3577	54	6%	2544	53	5%	2081				5	4%	272				
22	31%	4406	190	24%	31666	359	41%	25462	485	50%	20154	2	100%	225	63	49%	5480				
1	1%	194	46	6%	8308	23	3%	2591	25	3%	871				8	6%	1021				
2	3%	466	9	1%	1412	3	0%	436	1	0%	30				1	1%	198				

MA/SUFFOLK/0001.00

MA/SUFFOLK/0002.01

LOAN ORIGINATED	2	50%	73			
APPROVED, NOT ACCEPTED						
APP DENIED	2	50%	35	1	100%	25
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0002.02

LOAN ORIGINATED	1	50%	148	1	100%	150
APPROVED, NOT ACCEPTED						
APP DENIED	1	50%	15			
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Fleet National Bank Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans												Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans								
A			B			C			D			E			& E		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's
						2	100%	191	4	50%	258						
									4	50%	113						
			1	100%	252	3	43%	158									
						4	57%	237	1	100%	150						
			1	50%	54												
			1	50%	464	2	100%	39									
			4	67%	524	4	80%	330	1	33%	50						
			2	33%	219	1	20%	10	2	67%	41						

Fleet National Bank Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																				
Home Purchase Loans															Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans											
A			B			C			D			E			& E					
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's			
			3	100%	332	3	50%	214	3	75%	77				2	100%	190			
						1	17%	25												
						2	33%	75	1	25%	1									
			2	67%	216	2	67%	114	1	50%	30									
			1	33%	5	1	33%	30	1	50%	100									
			2	100%	212	2	100%	311	1	100%	16									
			3	60%	137	1	50%	23							2	100%	61			
			1	20%	151	1	50%	40	1	100%	45									
			1	20%	170															

Fleet National Bank Loan Information by Census Tract

[illegible]

Fleet National Bank Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0101.02

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	1	100%	15	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/0102.00

[illegible]

MA/SUFFOLK/0103.00

LOAN ORIGINATED	1	50%	120
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN	1	50%	96
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0104.01

LOAN ORIGINATED	2	50%	488	1	50%	30	2	67%	149			
APPROVED, NOT ACCEPTED												
APP DENIED	1	25%	115	1	50%	50	1	33%	8	1	100%	15
APP WITHDRAWN												
FILES CLOSED FOR INCOMPLETENESS	1	25%	235									

Fleet National Bank

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																				
Home Purchase Loans																				
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans			Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D					
A			B			C			D			E			& E					
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's			
			1	50%	60				2	100%	135				1	100%	60			
			1	50%	60															
						1	50%	22	3	100%	127							1	100%	20
						1	50%	20												
						2	67%	3100				1	50%	15						
			1	33%	284				1	50%	200				2	100%	484			
			7	70%	4560	2	33%	150	3	38%	100				2	67%	590			
									1	13%	200									
			2	20%	372	4	67%	437	3	38%	130				1	33%	240			
			1	10%	440				1	13%	8									

Fleet National Bank Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans			Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
A			B			C			D			E			& E		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's
			7	78%	4969	4	36%	874	7	44%	784				2	50%	1390
									1	6%	41						
1	100%	189	1	11%	529	7	64%	377	8	50%	966				2	50%	242
			1	11%	220												
			4	67%	3878	5	56%	662	5	56%	328				1	33%	38
						1	11%	22									
			2	33%	453	2	22%	13	3	33%	145				1	33%	204
						1	11%	280	1	11%	75				1	33%	75
			6	100%	878	6	86%	710	3	38%	145				3	100%	379
						1	14%	67	4	50%	89						
									1	13%	100						
			5	56%	744	9	56%	961	5	50%	188				3	43%	299
						2	13%	164							1	14%	104
			3	33%	858	5	31%	1091	4	40%	340				2	29%	250
			1	11%	209				1	10%	15				1	14%	209

Fleet National Bank Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans												Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans								
A			B			C			D			E			& E		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's
			1	100%	154				2	100%	75						
			1	100%	147				1	50%	55						
						2	100%	458	1	50%	100						
			3	75%	755	1	50%	9	3	60%	220						
			1	25%	125				2	40%	17						
						1	50%	40									
1	100%	130	1	100%	432				3	60%	579						
						1	100%	48	2	40%	148						

Fleet National Bank Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																				
Home Purchase Loans															Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans											
A			B			C			D			E			& E					
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's			
			2	40%	872	4	50%	958	2	67%	156				1	50%	172			
			3	60%	950	4	50%	677							1	50%	57			
									1	33%	25									
			2	67%	363	2	40%	75	2	50%	217									
			1	33%	120	3	60%	70	2	50%	140									
						2	67%	125	1	100%	30									
						1	33%	100												
			2	33%	485	2	33%	483	2	40%	95									
			1	17%	252	2	33%	85												
			3	50%	522	2	33%	45	3	60%	140									

Fleet National Bank Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans												Loans on Dwellings for 5 or more families E			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D & E		
FHA, FSA/RHS & VA A			Conventional B			Refinancings C			Home Improvement Loans D								
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's
			3	100%	774	2	67%	90	2	100%	75						
						1	33%	25									
						1	50%	31	2	100%	187				1	100%	31
						1	50%	150									
			1	100%	306	1	100%	130	2	67%	55						
									1	33%	30						
			2	100%	274	1	33%	60	2	33%	115						
						1	33%	10									
						1	33%	10	4	67%	275				1	100%	100

Fleet National Bank Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans												Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans								
A			B			C			D			E			& E		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's
			1	100%	228				1	33%	10						
									2	67%	85						
1	100%	233	2	40%	407	5	83%	477	1	25%	14						
			1	20%	133												
						1	17%	230	3	75%	194				1	33%	150
			2	40%	404										2	67%	404
			4	100%	684				1	50%	19						
						1	100%	79									
									1	50%	25						
			2	100%	206												

Fleet National Bank

Loan Information by Census Track

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans			Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D & E		
A			B			C			D			E			& E		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's
			3	60%	335										1	50%	80
			1	20%	123	1	100%	60	4	100%	200				1	50%	60
			1	20%	89												
			1	100%	65										1	100%	65
						3	75%	486	1	50%	8						
			2	100%	143	1	25%	80	1	50%	25						
1	50%	120	1	100%	145												
										1	100%	8					
1	50%	160															

Fleet National Bank Loan Information by Census Tract

MA/SUFFOLK/0512.00

[illegible]

MA/SUFFOLK/0601.00

LOAN ORIGINATED	1	33%	145	6	60%	599	2	50%	89
APPROVED, NOT ACCEPTED							1	25%	5
APP DENIED	2	67%	511	3	30%	75	1	25%	75
APP WITHDRAWN	1	100%	194	1	10%	25			
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/0602.00

LOAN ORIGINATED	1	50%	64	2	100%	79	1	100%	75
APPROVED, NOT ACCEPTED									
APP DENIED									
APP WITHDRAWN	1	50%	390						
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/0603.00

Fleet National Bank Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans												Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans								
A			B			C			D			E			& E		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's
			2	40%	416	6	60%	250	2	40%	50						
									2	40%	31						
			2	40%	125	3	30%	326	1	20%	18						
			1	20%	180	1	10%	96									
1	100%	220	4	80%	474	4	80%	200	5	83%	161						
						1	20%	112	1	17%	50						
			1	20%	180										1	100%	180
			3	75%	483				2	67%	36				1	100%	156
			1	25%	102	1	100%	130	1	33%	25						
1	100%	214	4	57%	618				1	50%	25						
			2	29%	301	1	100%	75	1	50%	25						
			1	14%	192												

Fleet National Bank Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																				
Home Purchase Loans															Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans											
A			B			C			D			E			& E					
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's			
1	100%	182	3	60%	534	4	67%	508	4	80%	177									
			1	20%	50							1	50%	50						
			1	20%	140	2	33%	90	1	20%	40							1	50%	140
			2	67%	292	1	50%	89	1	100%	8							1	100%	40
			1	33%	332	1	50%	50												
						2	100%	19												
			2	67%	489															
			1	33%	81	1	100%	10												

Fleet National Bank

Loan Information by Census Track

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans			Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
A			B			C			D			E			& E		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's
			2	100%	530	2	100%	330									
										2	100%	65					
			3	75%	624	1	100%	80									
										5	100%	330					
			1	25%	356												
			3	60%	675	5	36%	262	8	57%	697				1	100%	140
						1	7%	25	2	14%	58						
			1	20%	160	5	36%	570	3	21%	265						
			1	20%	150	3	21%	1389	1	7%	10						
			3	25%	692	4	100%	722	10	67%	681				2	67%	312
									1	7%	25						
			8	67%	2849				4	27%	227						
			1	8%	198										1	33%	198

Fleet National Bank Loan Information by Census Tract

MA/SUFFOLK/0706.00

LOAN ORIGINATED	3	60%	839	3	43%	225	7	47%	590
APPROVED, NOT ACCEPTED				1	14%	25	1	7%	80
APP DENIED	2	40%	672	3	43%	36	7	47%	538
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/0707.00

LOAN ORIGINATED	2	100%	430	1	100%	50	1	100%	231
APPROVED, NOT ACCEPTED									
APP DENIED									
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/0708.00

LOAN ORIGINATED	2	50%	464	4	67%	225	6	67%	291			
APPROVED, NOT ACCEPTED							1	11%	249			
APP DENIED	1	25%	25	2	33%	118	2	22%	78	1	100%	210
APP WITHDRAWN												
FILES CLOSED FOR INCOMPLETENESS	1	25%	272									

MA/SUFFOLK/0709.00

Fleet National Bank Loan Information by Census Tract

MA/SUFFOLK/0710.00

LOAN ORIGINATED	6	100%	549	4	57%	186	3	60%	300
APPROVED, NOT ACCEPTED							1	20%	11
APP DENIED				3	43%	60	1	20%	65
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/0711.00

LOAN ORIGINATED	1	100%	253	1	100%	25
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0712.00

LOAN ORIGINATED	4	100%	630	2	50%	191	3	100%	570
APPROVED, NOT ACCEPTED				1	25%	5			
APP DENIED				1	25%	290			
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/0801.00

LOAN ORIGINATED	1	100%	176
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Fleet National Bank Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																				
Home Purchase Loans															Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans											
A			B			C			D			E			& E					
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's			
2	100%	265	2	67%	179	2	33%	101												
			1	33%	81	3	50%	153	1	100%	50									
						1	17%	135												
1	100%	351				3	60%	380	1	100%	15									
						2	40%	157												
			4	100%	280	1	100%	25												
										2	100%	65				1	100%	30		
			1	50%	188				2	100%	94									
						1	100%	100												
			1	50%	188															

Fleet National Bank Loan Information by Census Tract

MA/SUFFOLK/0807.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	1	100%	45	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/0809.00

LOAN ORIGINATED	1	25%	252				1	100%	100
APPROVED, NOT ACCEPTED				1	50%	25			
APP DENIED	2	50%	349	1	50%	210			
APP WITHDRAWN	1	25%	252						
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/0810.00

[illegible]

MA/SUFFOLK/0811.00

[illegible]

Fleet National Bank Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans												Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans								
A			B			C			D			E			& E		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's
			1	100%	235	1	100%	10	1	17%	60						
									1	17%	60						
									4	67%	175				2	100%	100
			1	100%	197	1	50%	120	1	50%	3						
						1	50%	128	1	50%	35						
			3	75%	240	1	100%	213									
			1	25%	30				4	100%	265						
			2	50%	463	1	33%	34	1	100%	18						
			1	25%	180	1	33%	10									
			1	25%	270	1	33%	28									

Fleet National Bank Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0816.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	2	100%	35	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/0817.00

[illegible]

MA/SUFFOLK/0818.00

[illegible]

MA/SUFFOLK/0819.00

[illegible]

Fleet National Bank Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																				
Home Purchase Loans															Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans											
A			B			C			D			E			& E					
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's			
			4	57%	748	2	40%	195												
			2	29%	442															
1	100%	210				3	60%	52	2	100%	44									
			1	14%	129															
									2	50%	62									
			1	100%	100				1	25%	50									
									1	25%	25									
			1	17%	225	2	40%	193	2	20%	59									
			2	33%	297	1	20%	99							1	33%	30			
			3	50%	485	2	40%	56	8	80%	257							2	67%	69
									1	33%	24									
									2	67%	63									

Fleet National Bank Loan Information by Census Tract

[illegible]

Fleet National Bank Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																				
Home Purchase Loans															Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans											
A			B			C			D			E			& E					
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's			
			2	40%	165	2	50%	343	3	100%	106									
2	100%	424	3	60%	440	2	50%	297												
			1	100%	203				1	100%	27									
						1	100%	25												
			2	67%	161				1	25%	10									
									2	50%	135									
			1	33%	214	2	100%	272												
									1	25%	30									
			3	100%	549	1	13%	210	2	17%	81									
						2	25%	160												
						4	50%	530	10	83%	392									
						1	13%	180												

Fleet National Bank Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans												Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans								
A			B			C			D			E			& E		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's
			4	57%	463	2	29%	80	3	75%	127						
						5	71%	506	1	25%	35	1 100% 94					
			3	43%	415												
			1	100%	210	1	17%	23	1	33%	100						
						1	17%	155									
						4	67%	512	2	67%	10	1 100% 158					
			5	83%	513	2	67%	187							1	100%	67
			1	17%	185	1	33%	44	3	100%	105						
1	50%	187	7	78%	1360	1	50%	10	2	29%	50						
1	50%	236	2	22%	164	1	50%	10	5	71%	138	1 100% 84					

Fleet National Bank Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans			Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
												E			& E		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's
3 100% 668			7 88% 996			1 33% 73			4 29% 67								
									1 7% 28								
			1 13% 30			2 67% 151			9 64% 257						1 100% 30		
1 50% 191			2 50% 368			6 55% 616			4 40% 146								
						1 9% 50											
1 50% 246			1 25% 204			4 36% 74			6 60% 89								
			1 25% 223														
			2 67% 307			5 56% 456											
									1 50% 20								
						4 44% 93			1 50% 30								
			1 33% 240														
			1 20% 40			1 100% 206			6 43% 234								
			1 20% 204														
1 100% 174			1 20% 8						8 57% 205								
			2 40% 157														

Fleet National Bank

Loan Information by Census Track

Loans on 1-to-4 Family Dwellings																				
Home Purchase Loans																				
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans			Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D					
A			B			C			D			E			& E					
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's			
			9	56%	1234	4	44%	147	4	31%	155				1	33%	132			
			6	38%	592	4	44%	318	9	69%	440				2	67%	184			
			1	6%	287	1	11%	50												
			10	71%	1258	2	33%	262	6	40%	194				3	60%	352			
			1	7%	220	2	33%	106	1	7%	8				1	20%	58			
			2	14%	430	2	33%	118	7	47%	246				1	20%	106			
			1	7%	220				1	7%	75									
			4	100%	792	4	44%	275	7	47%	367									
						5	56%	372	8	53%	440				1	100%	150			
1	33%	233	3	43%	322	3	50%	242	1	11%	100									
						1	17%	62												
2	67%	458	2	29%	329	2	33%	239	6	67%	385									
									2	22%	82				1	100%	68			
			2	29%	190															

Fleet National Bank Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans												Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans								
A			B			C			D			E			& E		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's
			9	75%	1662				2	22%	50						
			3	25%	320	3	75%	225	7	78%	286				1	100%	50
						1	25%	10									
1	50%	179	9	75%	1334	1	17%	175	1	14%	70						
						1	17%	25									
1	50%	179	3	25%	400	4	67%	174	6	86%	195				1	100%	25
			3	60%	672	2	40%	375	2	29%	41				1	100%	130
			1	20%	185				2	29%	27						
1	100%	128				2	40%	165	3	43%	130						
			1	20%	194	1	20%	2									
			8	67%	1222	3	43%	211	5	42%	254						
1	100%	198	2	17%	350	4	57%	325	6	50%	195				2	100%	100
			2	17%	442				1	8%	18						

Fleet National Bank Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans			Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
A			B			C			D			E			& E		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's
			7	78%	1344	5	36%	389									
			2	22%	202	8	57%	666	7	100%	379				2	100%	60
						1	7%	15									
1	100%	231	3	100%	565	1	14%	28	4	27%	238						
						6	86%	458	11	73%	348				1	100%	163
			14	74%	1838	3	38%	321	9	41%	311						
									2	9%	43						
			5	26%	867	4	50%	239	9	41%	221				1	100%	25
						1	13%	130	2	9%	22						
1	100%	155	1	100%	80	2	67%	130	2	40%	18						
									2	40%	30						
						1	33%	34	1	20%	20						

Fleet National Bank Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans													Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans								
A			B			C			D			E			& E		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's
2	100%	307	5	100%	914	5	71%	338	3	33%	155						
									1	11%	25						
									1	14%	196	5	56%	195			
									1	14%	8						
1	100%	228	7	64%	1194	6	86%	702	2	18%	70						
									2	18%	240						
			4	36%	711	1	14%	23	7	64%	269				1	100%	50
1	50%	170	4	57%	815	9	64%	540	8	44%	300				1	100%	30
			1	14%	198							1	6%	50			
1	50%	150	2	29%	465	5	36%	484	9	50%	336						
1	100%	120	8	80%	1068	4	40%	238	1	8%	21						
			1	10%	165				1	8%	15						
			1	10%	237	6	60%	381	10	83%	351				1	100%	58

Fleet National Bank Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans												Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans								
A			B			C			D			E			& E		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's
			2	67%	383	7	64%	570	2	20%	63				1	100%	189
									1	10%	3						
			1	33%	21	3	27%	205	7	70%	188						
						1	9%	100									
			2	100%	315	4	67%	344	1	20%	20				1	100%	106
1	100%	278				2	33%	70	4	80%	159						
			2	33%	343												
			4	67%	585	7	100%	397	4	80%	182				2	100%	133
									1	20%	30						
			10	91%	1910	5	63%	450	2	29%	75				1	100%	134
						1	13%	15									
1	100%	124				2	25%	229	5	71%	218						
			1	9%	180												

Fleet National Bank Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans			Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
A			B			C			D			E			& E		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's
			1	50%	126	4	50%	367	3	43%	176						
			1	50%	195	4	50%	70	3	43%	90						
									1	14%	25						
1	100%	184	3	100%	416	3	33%	230	4	57%	112						
						2	22%	131									
						4	44%	133	3	43%	95						
			3	60%	616	5	50%	510	4	40%	74						
						1	10%	44									
			2	40%	520	4	40%	136	6	60%	183				1	100%	306
			4	67%	928	9	56%	708	4	50%	230						
						1	6%	28									
			2	33%	379	4	25%	372	4	50%	110						
						2	13%	60									

Fleet National Bank Loan Information by Census Tract

MA/SUFFOLK/1105.01

MA/SUFFOLK/1105.02

[illegible]

MA/SUFFOLK/1106.01

LOAN ORIGINATED	1	100%	252	6	67%	218	4	57%	209
APPROVED, NOT ACCEPTED				1	11%	25	2	29%	9
APP DENIED				2	22%	127	1	14%	30
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/1106.02

LOAN ORIGINATED	1	50%	30	3	60%	130			
APPROVED, NOT ACCEPTED									
APP DENIED	1	50%	161	1	50%	26	2	40%	105
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS	1	100%	306	1	50%	161			

Fleet National Bank Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans												Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans								
A			B			C			D			E			& E		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's
			4	57%	450	7	58%	832	9	56%	570						
									1	6%	27						
			3	43%	875	5	42%	1016	6	38%	625				1	100%	100
			2	50%	317	1	50%	60	2	20%	75						
									1	10%	40						
			2	50%	75	1	50%	87	6	60%	294				1	100%	30
									1	10%	113						
			1	100%	252	5	83%	473	5	63%	469	4	67%	254			
			1	17%	136				2	33%	200						
			4	67%	687	5	63%	284	1	25%	65						
						1	13%	45	1	25%	120						
			1	17%	110	2	25%	222	2	50%	69						
			1	17%	140												

Fleet National Bank Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans												Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans								
A			B			C			D			E			& E		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's
			3	60%	685				1	17%	145				1	50%	227
1	100%	299	2	40%	277				5	83%	160				1	50%	50
			1	33%	133	3	50%	538	7	70%	204						
			2	67%	240	3	50%	182	3	30%	210				2	100%	240
			1	50%	224	2	67%	193	1	50%	25				1	100%	224
			1	50%	225	1	33%	62	1	50%	175						
						4	67%	132	4	57%	120				1	100%	50
									1	14%	25						
			2	100%	338	2	33%	27	1	14%	50						
									1	14%	25						

Fleet National Bank Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																				
Home Purchase Loans															Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans											
A			B			C			D			E			& E					
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's			
3	100%	543	7	58%	1422	8	40%	623	10	48%	321									
			4	33%	436	12	60%	994	11	52%	318									
			1	8%	219															
			4	80%	878	3	30%	179	3	25%	80									
1	100%	173							1	8%	12									
			1	20%	171	7	70%	398	6	50%	269									
									2	17%	28									
1	100%	181	6	100%	1044	6	43%	502	7	47%	318									
						1	7%	20	1	7%	8									
						6	43%	399	7	47%	130									
						1	7%	50												
			7	70%	1199	6	43%	522	6	55%	200									
			1	10%	190															
			1	10%	276	8	57%	757	5	45%	130									
			1	10%	171															

Fleet National Bank Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																			
Home Purchase Loans																			
										Loans on Dwellings for 5 or more families				Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D & E					
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans										
A			B			C			D			E				& E			
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's		

MA/SUFFOLK/1702.00

LOAN ORIGINATED	1	100%	142	4	67%	68		
APPROVED, NOT ACCEPTED				1	17%	10		
APP DENIED			1	100%	35	1	17%	25
APP WITHDRAWN								
FILES CLOSED FOR INCOMPLETENESS								

MA/SUFFOLK/1703.00

[illegible]

MA/SUFFOLK/1704.00

[illegible]

MA/SUFFOLK/1705.00

[illegible]

Fleet National Bank

Loan Information by Census Track

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans			Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
A			B			C			D			E			& E		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's
			3	75%	656	6	60%	332	3	50%	140						
						1	10%	30									
			1	25%	216	3	30%	117	3	50%	37						
			7	78%	793	5	83%	428	1	33%	10						
						1	17%	50	2	67%	55				1	100%	25
			2	22%	360												
			4	100%	701	1	25%	37	2	40%	53						
						3	75%	120	3	60%	240						
			2	100%	212	6	67%	267	3	43%	121						
									1	14%	17						
						3	33%	99	3	43%	100						

Fleet National Bank Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																				
Home Purchase Loans															Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans											
A			B			C			D			E			& E					
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's			
						2	33%	94												
						2	33%	90	2	100%	35									
						2	33%	70												
						3	60%	401	3	43%	190									
						1	20%	58	4	57%	290				1	100%	25			
						1	20%	25												
			1	100%	89	2	50%	172	1	25%	8									
						1	25%	25	2	50%	125									
						1	25%	80												
									1	25%	70									
			1	100%	108	2	67%	220	4	50%	160									
						1	33%	20	4	50%	113				1	100%	25			



Hyde Park Cooperative Bank

**Overview**

Hyde Park Cooperative Bank
1172 River Street
Hyde Park, MA

Description

Hyde Park Cooperative Bank is a state chartered thrift with principal offices in Boston, Massachusetts and assets in excess of \$82 million. Hyde park Cooperative Bank participates in first time home buyers programs and a "soft-second" program. Its primary focus is residential mortgage lending. In 2000, Hyde Park Cooperative operated two branches in Boston.

Principal Officers**CEO**

Norman Williamson
1172 River Street
Hyde Park, MA
617-364-6000

CFO

Robert Nelson
1172 River Street
Hyde Park, MA
617-364-6000

Chief Compliance Officer

Robert Nelson
1172 River Street
Hyde Park, MA
617-364-6000

Employees

Number of Employees	NA
Number of Employees in Massachusetts	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches - Total	2
Branches within Boston PSMA	2
Number of ATMs	4
Number of Free Standing ATMs	2

CRA Rating

Rating Agency	Office of Thrift Supervision
Most Recent Rating	1999
Overall Rating	SATISFACTORY⁶³
Lending Test Rating	NA
Investment Test Rating	NA
Service Test Rating	NA

⁶³ Based on most recent CRA Performance Evaluation by OTS published 1999.



Discussion

Overall rating: SATISFACTORY⁶⁴

Lending Test

Lending Test Rating: NOT RATED

According to the OTS 1999 report, Hyde Park Cooperative Bank's satisfactory performance rating was due to the fact that the majority of residential loans originated by Hyde Park Cooperative Bank were within their assessment area.

General Responsiveness to Credit Needs

Hyde Park Cooperative Bank made 12 mortgage loans to low and moderate-income borrowers. These loans totaled \$825,000.

They made 3 small business loans that totaled \$670,000.

Nineteen (19) consumer loans, totaling \$87,000, were given to low and moderate-income borrowers.

Responsiveness to Low and Moderate-Income Credit Needs

Hyde Park Cooperative Bank offers the following lending programs to help meet the needs of the community:

- First Time Buyer Program
- Soft Second Program
- Boston Home Certificate
- Construction Loans
- Conforming Fixed Rate Mortgages
- Conforming ARM Mortgages
- Equity Loans and Lines of Credit
- Consumer Loans, including: Home Improvement, Auto and Personal Loans.

Leadership in Community Development Loans

Investment Test

Investment Test Rating: NOT RATED.

Service Test

Service Test Rating: NOT RATED.

Description of Service Delivery Systems

- Loans to small businesses (term, lines of credit, etc.)
- Commercial real estate loans
- Non-owner occupied, multi-family financing
- Construction loan program
- Full business banking services

Branch Information:

Branch locations in the Boston MSA:

Location	ATM	FSB
1172 River Street Hyde Park, MA 02136	✓	✓
185 Wolcott Square Hyde Park, MA 02136	✓	✓
427 Sprague Street Dedham, MA 02026	✓	✓
733 Centre Street Jamaica Plain, MA 02130	✓	✓

FSB: Full Service Branch

Additional Information

- Corporate Donations
- Hyde Park YMCA
- The Italian Home for Children
- Hyde Park Main Streets
- The Anderson Tree Lighting
- Massachusetts Bankers Association Charitable Foundation.

Year-Over-Year at a Glance

	1999	2000
HMDA Applications Received	27	22
HMDA Loans Originated	25	20
Low-Income Applications Received	1	1
Low-Income Loans Originated	1	1

HMDA reportable applications decreased by 5 in 2000, as did the number of loans originated.

⁶⁴ Based on most recent CRA Performance Evaluation by OTS published 1999.



Source Documents

Community Reinvestment Act Performance
Evaluation, Office of Thrift Supervision; June 7,
1999.

FFIEC HMDA Aggregate & Disclosure
Software Version 2.0, Board of the Governors of
the Federal Reserve System; 2000.

1999 Linked Deposit Report to the Mayor of the
City of Boston, NobleAssociates; June 2000.

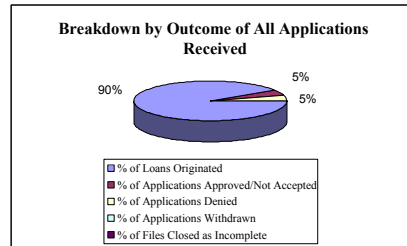
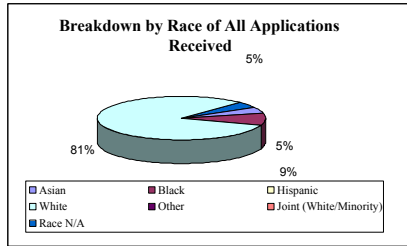
Hyde Park Cooperative Bank website
<http://www.hydeparkcooperative.com/>

Hyde Park Cooperative Bank Lending Information - HMDA

2000

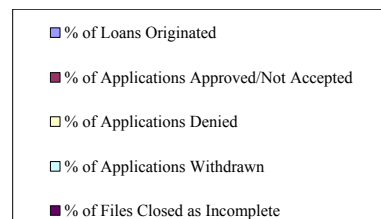
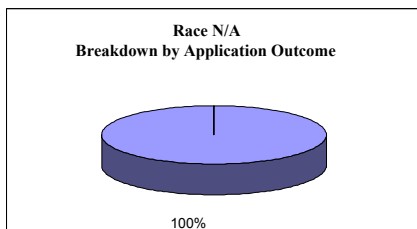
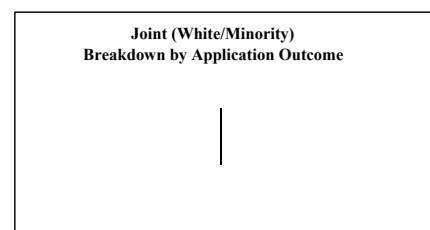
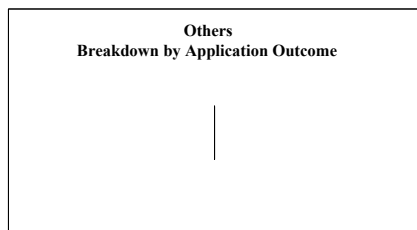
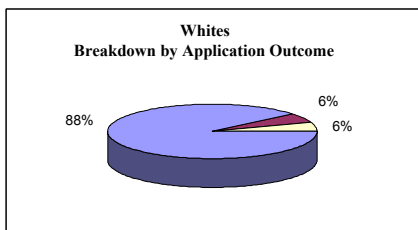
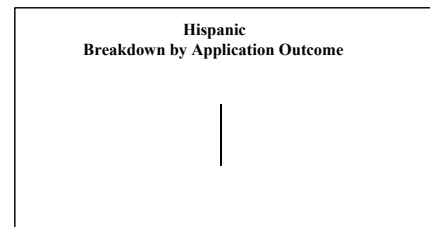
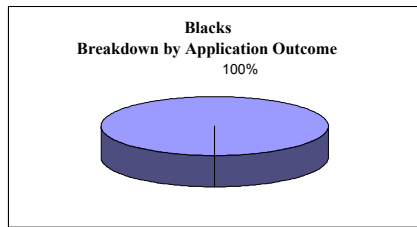
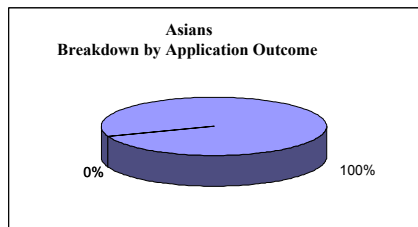
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	1	5%	1	100%	0	0%	0	0%	0	0%	0	0%
Black	2	9%	2	100%	0	0%	0	0%	0	0%	0	0%
Hispanic	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	18	82%	16	89%	1	6%	1	6%	0	0%	0	0%
Other	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	1	5%	1	100%	0	0%	0	0%	0	0%	0	0%
Total	22	100%	20	91%	1	5%	1	5%	0	0%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

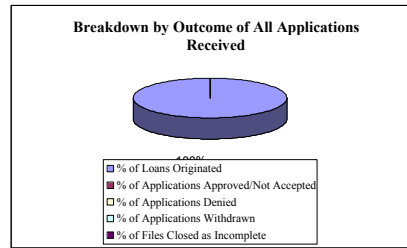
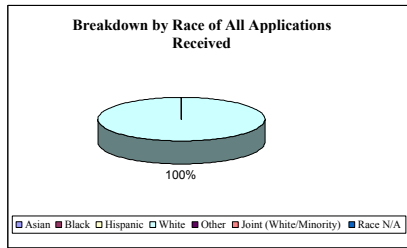
The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.



Hyde Park Cooperative Bank Low-Income Mortgage Information 2000

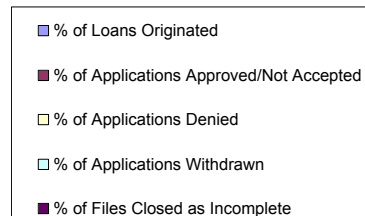
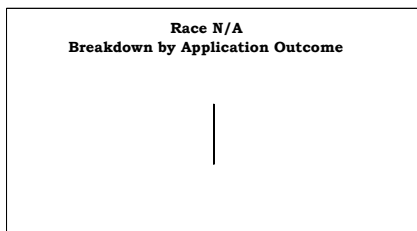
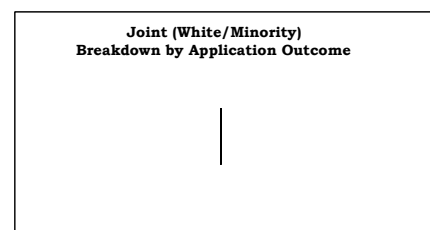
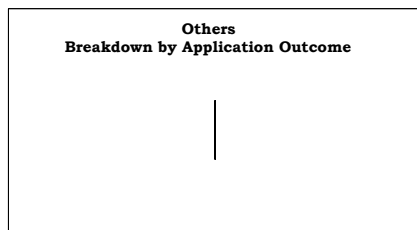
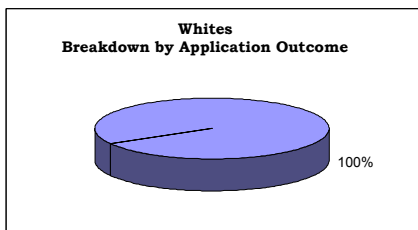
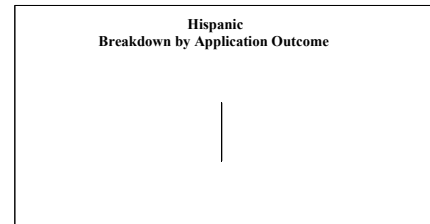
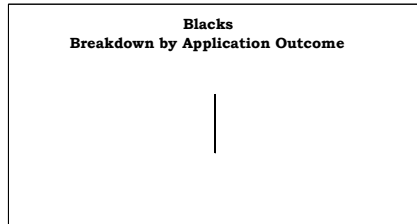
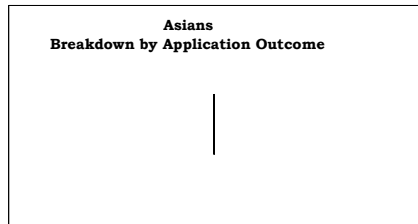
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Hispanic	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	1	100%	1	100%	0	0%	0	0%	0	0%	0	0%
Other	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	1	100%	1	100%	0	0%	0	0%	0	0%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.



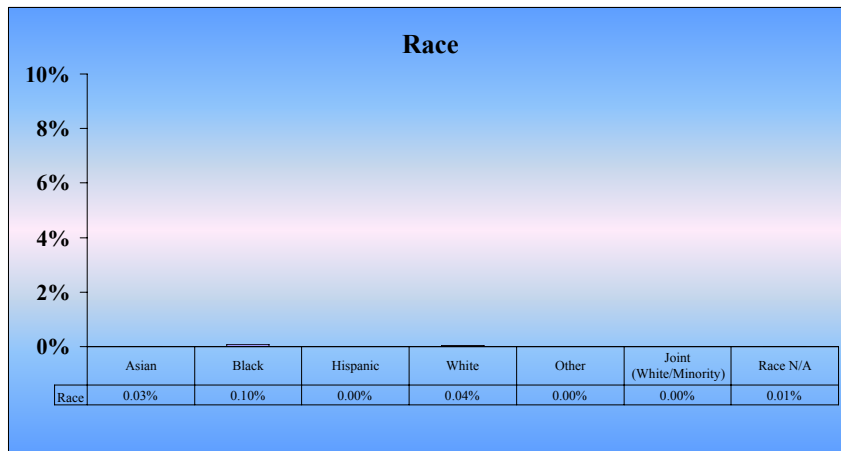
Compared against the MSA Aggregate Total

2000

Hyde Park Cooperative Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Asian	1	0.03%	1	0.04%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Black	2	0.10%	2	0.16%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Hispanic	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
White	18	0.04%	16	0.04%	1	0.03%	1	0.03%	0	0.00%	0	0.00%
Other	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	1	0.01%	1	0.02%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	22	0.04%	20	0.04%	1	0.02%	1	0.02%	0	0.00%	0	0.00%

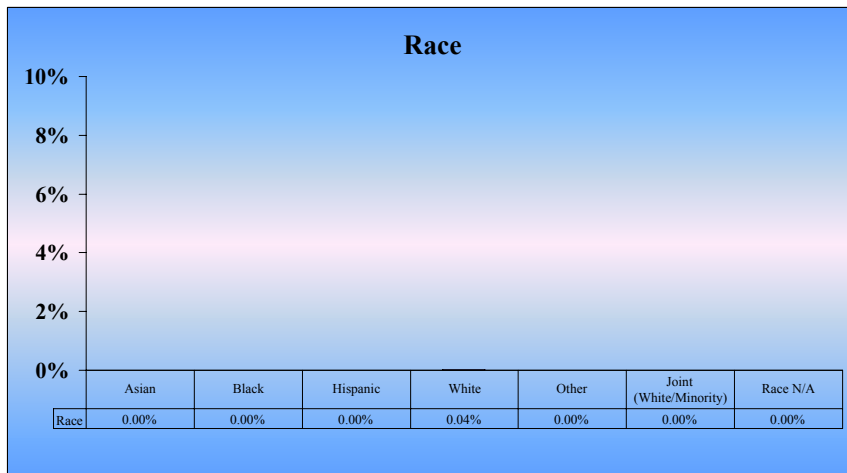
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Hyde Park Cooperative Bank Low-Income Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Asian	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Black	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Hispanic	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
White	1	0.04%	1	0.06%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	1	0.03%	1	0.04%	0	0.00%	0	0.00%	0	0.00%	0	0.00%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.





Employment Information

No data available

Hyde Park Cooperative Bank

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																		
Home Purchase Loans																		
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans			Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D & E			
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	

Hyde Park Cooperative Bank Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1105.02

LOAN ORIGINATED	1	100%	160	1	100%	160
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1202.00

LOAN ORIGINATED	1	100%	150
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1207.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	1	100%	40	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/1301.00

LOAN ORIGINATED	3	100%	557
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Hyde Park Cooperative Bank Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans												Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans								
A			B			C			D			E			& E		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's
									1	100%	75						
									1	100%	140						
									1	100%	85						
									1	100%	5						
									3	60%	128	3	100%	18			
									1	100%	100						
									2	40%	205						

Hyde Park Cooperative Bank Loan Information by Census Tract

[illegible]



Hyde Park Savings Bank



HYDE PARK SAVINGS BANK

The Home of *Free&Easy*® Banking

Overview

Hyde Park Savings Bank
1196 River Street
Hyde Park, MA

Description

Hyde Park Savings Bank is a state chartered, mutual savings bank headquartered in the Hyde Park neighborhood of Boston. With total assets of \$486 million, Hyde Park Savings Bank is primarily a mortgage lender with 98.1% of its portfolio secured by real estate.

Principal Officers

CEO

Kenneth Pierog
1196 River Street
Hyde Park, MA
617-361-6900

CFO

Steve McNulty
1196 River Street
Hyde Park, MA
617-361-6900

Chief Compliance Officer

Paul Bunker
1196 River Street
Hyde Park, MA
617-361-6900

Employees

Number of Employees	88
Number of Employees in Massachusetts	88
Percentage of Women Employees	72%
Percentage of Minority Employees	16%

Branches

Number of Branches - Total	4
Branches within Boston PSMA	2
Number of ATMs	4
Number of Free Standing ATMs	0

CRA Rating

Rating Agency	FDIC
Most Recent Rating	2001
Overall Rating	SATISFACTORY ⁶⁵
Lending Test Rating	LOW SATISFACTORY
Investment Test Rating	HIGH SATISFACTORY
Service Test Rating	HIGH SATISFACTORY

⁶⁵ Based on most recent CRA Performance Evaluation by FDIC published 2001.



Discussion

Overall rating: SATISFACTORY⁶⁶

Lending Test

Lending Test Rating: LOW SATISFACTORY

General Responsiveness to Credit Needs

Hyde Park Savings Bank (HPSB) is primarily a home mortgage lender with 94.1% of its loan portfolio secured by mortgages to residential properties for one to four families. The November 9, 2001 report generated by the FDIC focused primarily on the bank's home mortgage lending record.

The bank originated 305 HMDA reportable loans, totaling \$62.5 million, since January 1, 1999. Approximately 60.8% of the loans by number originated for the purchase of one to four-family residences. The HMDA data shows no home improvement loans, as the bank does not have a loan specifically for home improvement.

Responsiveness to Low and Moderate-Income Credit Needs

The number and dollar volume of HMDA lending has shown a downward trend since 1998. In 1998, the bank originated 343 HMDA reportable loans totaling \$42.0 million. For 1999, the number of HMDA reportable loans dropped by 29.1%, to 243 loans, totaling \$36.9 million. In 2000, the trend continued with a 46.9% decline in the number of HMDA loans originated. Several factors may have contributed to this decline. The rising interest rate environment in 1999 and 2000 reduced the demand for refinance loans. The escalating cost of homes in the area created a shortage of affordable homes. For example, the median selling prices in the assessment area increased an average of 30 % from 1998 to 2000. The bank is facing increasing competition from larger regional banks and mortgage companies.

The bank has originated an adequate percentage of loans within the assessment area.

The greatest percentage of loans in the assessment area is made in middle-income census tracts. Strong performance in the middle-income census tracts is attributed primarily to the high percentage of owner-occupied housing in these tracts.

The moderate-income census tracts account for the next largest share of loans originated. The moderate-income census tracts are located in the Hyde Park, Mattapan, Roslindale, and West Roxbury neighborhoods. The bank has done very well originating loans with the census tracts in Hyde Park and Roslindale.

Lending in Mattapan's moderate-income census tracts has been modest.

There were no loans in the low-income tract. However, that census tract has just 19 housing units and limited lending opportunities.

Leadership in Community Development Loans

The bank has originated or facilitated a relatively high level of community development loans.

The bank has participated with the Massachusetts Housing Investment Corporation to establish a loan pool of \$250,000 to finance new construction, rehabilitation and acquisition for low and moderate-income families. This loan pool represents loan guarantees for bridge loans.

Investment Test

Investment Test Rating: HIGH SATISFACTORY

Hyde Park Savings Bank's qualified investments include funding for section 8 housing units, business developments loans, CRA related debt instruments and revenue to fund mortgages and small business loans in low income areas of Boston.

- Two GNMA pass through pools were established to benefit the Florence Apartments in Roslindale which has 93% section-eight housing units. It also benefited the Cummins Towers in Roslindale, which has 76% section-eight housing units.
- A loan pool was established for the Boston Business Development Corporation. This

⁶⁶ Based on most recent CRA Performance Evaluation by FDIC published 2001.



organization uses these funds to originate loans to small manufacturing companies in Hyde Park Saving's CRA area, and throughout Massachusetts.

- There was an Investment of five shares in the Access Capital Strategies Community Investment Funds. These funds are backed by securities. The funds are used to provide financing for small businesses and for residential mortgages in the low and moderate-income, urban neighborhoods of Boston.
- The Community Reinvestment Act Qualified Investment Fund is an institutional mutual fund that invests in CRA related debt instruments, such as FNMA, FHLMC, GNMA and AAA-rated bondholders.

Service Test

Service Test Rating: HIGH SATISFACTORY

Description Service Delivery Systems

HPSB operates a main office and three full-service branch offices. The main office in Hyde Park is located in a moderate-income census tract, the Readville (Hyde Park) and Norwood offices are located in middle-income census tracts, and the Dedham branch office is located in an upper-income census tract. All offices, with the exception of the Dedham office, have drive-up windows.

The bank operates Automated Teller Machines (ATM) at each of its offices. HPSB offers a "Bank by Mail" service that is available to customers who are unable to get to a branch.

The bank recently added a 24-hour Bank-by-Phone service.

The bank has not opened or closed any branch offices since the last FDIC examination.

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
1172 River Street Hyde Park, MA*	✓	✓
185 Wolcott Square Hyde Park, MA*	✓	✓
427 Sprague Street Dedham, MA	✓	✓
733 Centre Street Jamaica Plain, MA	✓	✓

FSB: Full Service Branch

*Branches and ATMs located in low and moderate-income geographies.

Special Programs

The HPSB provides a relatively high level of community development services. They collaborate with the Ecumenical Social Action Committee (ESAC) of Jamaica Plain in its Sustainable Homeownership Program. The goal of this program is to prevent needless home foreclosures. HPSB has financed five homeowners out of foreclosure since August 1999.

They are also a participant in the Massachusetts Banker's Association Foreclosure Prevention Project. This project is a cooperative program providing financial counseling to low and moderate-income homeowners across Massachusetts.

HPSB is an approved participant in the Boston Certificate Initiative Program, sponsored by the City of Boston's Department of Neighborhood Development, and the Boston Local Development Corporation. This program awards funds to qualified homebuyers in Boston for down payment and closing cost assistance.

The bank has a designated "Credit Helper" at each of its office locations. The "Credit Helper" provides counseling for customers and answers loan related questions.

They also participate in the "Second Opinion" mortgage review. This service is free-of-charge and was implemented to help protect customers and non-customers from dubious mortgage origination practices.



The bank offers low-cost checking and savings products to all customers.

Year-Over-Year at a Glance

	1999	2000
HMDA Applications Received	134	94
HMDA Loans Originated	117	87
Low-Income Applications Received	8	4
Low-Income Loans Originated	6	4

The number and dollar volume of HMDA lending has shown a downward trend since 1998. In 1998, the bank originated 343 HMDA reportable loans totaling \$42.0 million. For 1999, the number of HMDA reportable loans dropped by 29.1%, to 243 loans, totaling \$36.9 million. In 2000, the trend continued with a 46.9% decline in the number of HMDA loans originated. Several factors may have contributed to this decline. The rising interest rate environment in 1999 and 2000 reduced the demand for refinance loans. The escalating cost of homes in the area created a shortage of affordable homes. For example, the median selling prices in the assessment area increased an average of 30 % from 1998 to 2000. The bank is facing increasing competition from larger regional banks and mortgage companies.



Source Documents

Community Reinvestment Act Performance
Evaluation, Federal Deposit Insurance
Corporation; May 9, 2001.

Annual CRA Report to the Commissioner of
Banks, Commonwealth of Massachusetts; 2000.

FFIEC HMDA Aggregate & Disclosure
Software Version 2.0, Board of the Governors of
the Federal Reserve System; 2000.

1999 Linked Deposit Report to the Mayor of the
City of Boston, NobleAssociates; June 2000.

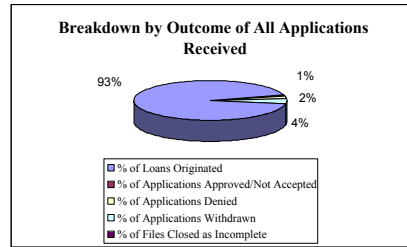
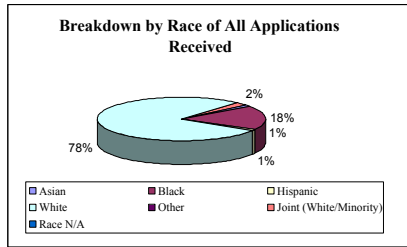
Hyde Park Savings Bank website
<http://www.hydeparkbank.com/>

Hyde Park Savings Bank Lending Information - HMDA

2000

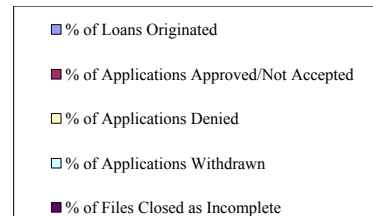
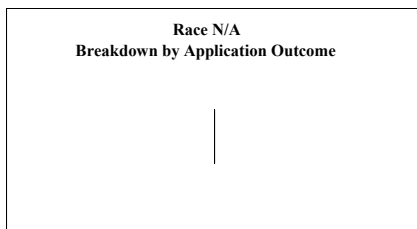
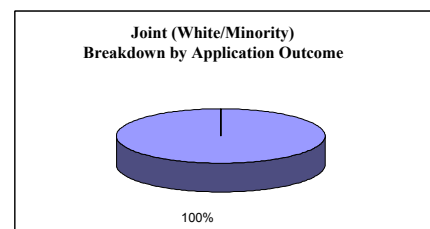
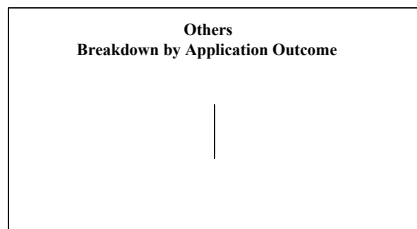
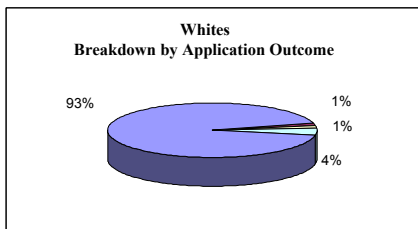
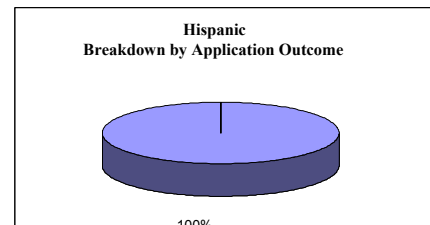
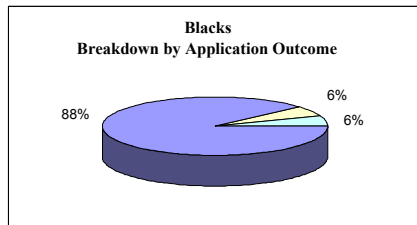
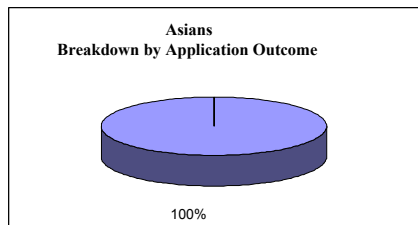
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	1	1%	1	100%	0	0%	0	0%	0	0%	0	0%
Black	17	18%	15	88%	0	0%	1	6%	1	6%	0	0%
Hispanic	1	1%	1	100%	0	0%	0	0%	0	0%	0	0%
White	73	78%	68	93%	1	1%	1	1%	3	4%	0	0%
Other	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	2	2%	2	100%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	94	100%	87	93%	1	1%	2	2%	4	4%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

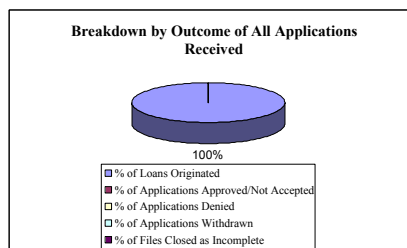
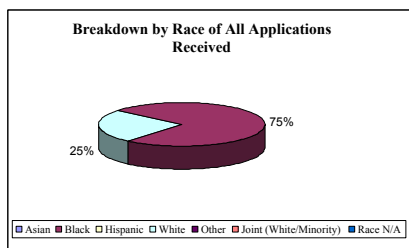


Hyde Park Savings Bank Low-Income Mortgage Information

2000

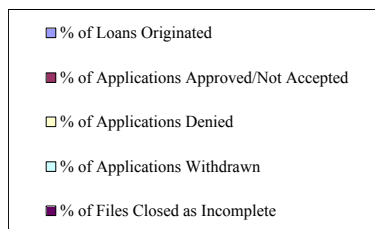
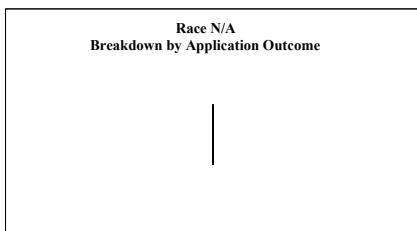
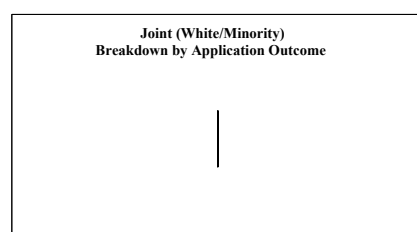
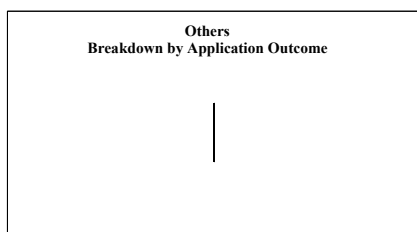
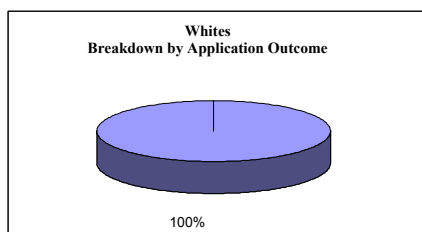
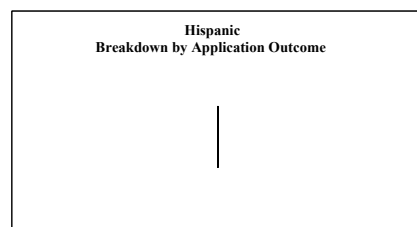
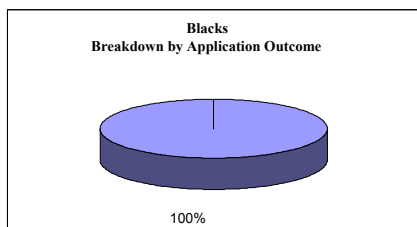
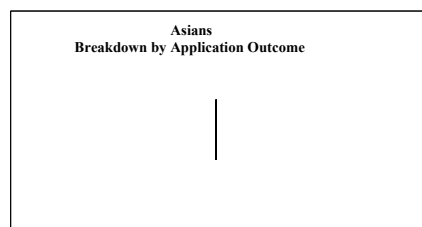
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black	3	75%	3	100%	0	0%	0	0%	0	0%	0	0%
Hispanic	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	1	25%	1	100%	0	0%	0	0%	0	0%	0	0%
Other	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	4	100%	4	100%	0	0%	0	0%	0	0%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.



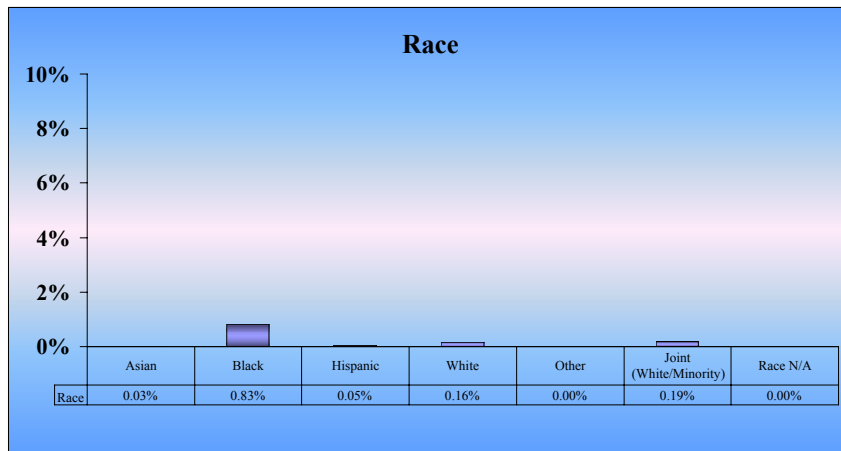
Compared against the MSA Aggregate Total

2000

Hyde Park Savings Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Asian	1	0.03%	1	0.04%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Black	17	0.83%	15	1.21%	0	0.00%	1	0.23%	1	0.63%	0	0.00%
Hispanic	1	0.05%	1	0.08%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
White	73	0.16%	68	0.19%	1	0.03%	1	0.03%	3	0.12%	0	0.00%
Other	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	2	0.19%	2	0.24%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	94	0.15%	87	0.19%	1	0.02%	2	0.03%	4	0.10%	0	0.00%

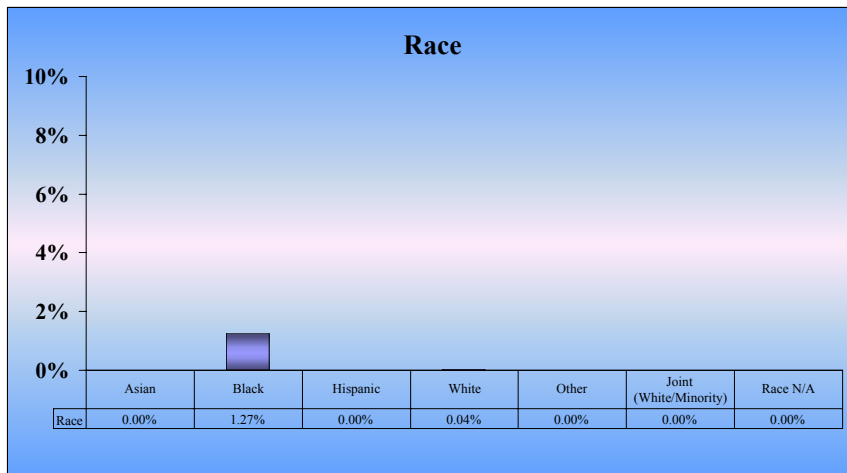
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Hyde Park Savings Bank Low-Income Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Asian	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Black	3	1.27%	3	2.24%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Hispanic	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
White	1	0.04%	1	0.06%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	4	0.11%	4	0.18%	0	0.00%	0	0.00%	0	0.00%	0	0.00%

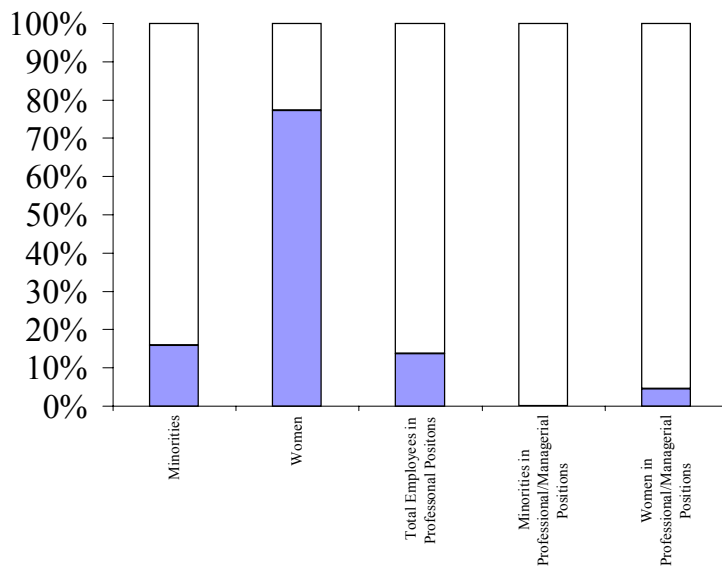
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Hyde Park Savings Bank Employment Numbers

	Number of Employees	Percent of Total Employees
Total	88	
Minorities	14	16%
Women	68	77%
Total Employees In Professional Positions	12	14%
Minorities in Professional or Managerial Positions	0	0%
Women in Professional or Managerial Positions	4	5%

Hyde Park Savings Bank



This chart illustrates the percentage of employees in each category measured against the total employee population. For example, the category **Minorities** represents the percentage of employees reported as minorities, regardless of gender, measured against the total population of bank employees; the category of **Minorities** in professional/managerial positions is the total number of reported minorities in professional/managerial positions, regardless of gender, when measured against the total population of bank employees. For raw number comparison see table above.

Hyde Park Savings Bank Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans												Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans								
A			B			C			D			E			& E		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's
			41	93%	7769	19	90%	2329				2	67%	447	4	100%	455
						1	5%	150									
			3	7%	304	1	5%	230				1	33%	360			
						1	100%	100									
			1	100%	309												
			1	100%	108												

Hyde Park Savings Bank Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0901.00

LOAN ORIGINATED	1	100%	98
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0903.00

LOAN ORIGINATED	2	100%	170
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0911.00

LOAN ORIGINATED	1	100%	176
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0917.00

LOAN ORIGINATED	1	100%	243
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Hyde Park Savings Bank Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0920.00

LOAN ORIGINATED	1	100%	53
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0922.00

LOAN ORIGINATED	1	100%	195
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0923.00

LOAN ORIGINATED	1	100%	197
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1003.00

LOAN ORIGINATED	1	100%	268
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Hyde Park Savings Bank Loan Information by Census Tract

[illegible]

Hyde Park Savings Bank Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1011.02

LOAN ORIGINATED	1	100%	240
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1102.00

LOAN ORIGINATED	1	100%	125
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1104.02

LOAN ORIGINATED	2	100%	432	1	100%	184
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1105.02

LOAN ORIGINATED	3	100%	587	1	100%	116
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Hyde Park Savings Bank Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1106.02

LOAN ORIGINATED	1	100%	80
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1301.00

LOAN ORIGINATED	3	100%	559
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1303.00

LOAN ORIGINATED	1	100%	240
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1304.01

LOAN ORIGINATED	1	100%	256	1	100%	195
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Hyde Park Savings Bank Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1403.00

LOAN ORIGINATED	1	100%	173	1	100%	182
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1404.00

[illegible]



Liberty Bank & Trust



Overview

Liberty Bank & Trust⁶⁷
21 Milk Street
Boston, MA

Description

Liberty Bank is a \$31 million Liberty Bank & Trust company was founded in 1965, and operated two branches in the Boston area focused on the Asian American market.⁶⁸

Principal Officers

CEO⁶⁹

Lei Pei Wu
800 West Street
Los Angeles, California
213-896-0098

President/Regional President

Linda Moulton
21 Milk Street
Boston, MA
617-338-4700

CFO

Peter Lowe
800 West Street
Los Angeles, California
213-896-0098

Chief Compliance Officer

Shirley Wong
4128 Temple City Blvd.
Rosemead, CA
626-582-7269

Employees

Number of Employees	27
Number of Employees in Massachusetts	NA
Percentage of Women Employees	.7%
Percentage of Minority Employees	18%

Branches

Number of Branches - Total	2
Branches within Boston PSMA	2
Number of ATMs	NA
Number of Free Standing ATMs	NA

CRA Rating

Rating Agency	FDIC
Most Recent Rating	1999

Overall Rating	SATISFACTORY ⁷⁰
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Lending Test Rating	NA
Investment Test Rating	NA
Service Test Rating	NA

⁶⁷ On March 1, 2002 Liberty Bank was acquired by General Bank of California.

⁶⁸ General Bank Web site

⁶⁹ Effective 3/1/2002

⁷⁰ Based on most recent CRA Performance Evaluation by FDIC published 1999.

**Discussion****Overall rating: SATISFACTORY⁷¹****Lending Test**

Lending Test Rating: NOT RATED.

General Responsiveness to Credit Needs

Liberty Bank & Trust is primarily a commercial bank that lends funds to small and medium-sized businesses. The applications and originations of mortgages are minimal.

Responsiveness to Low and Moderate-Income Credit Needs

Liberty Bank & Trust generated one mortgage to a low or moderate-income individual in the year 2000. The mortgage amount was \$125,000.

They generated 62 small business loans, totaling \$5,375,000.

Leadership in Community Development Loans

According to the 1999 FDIC report, Liberty Bank & Trust purchased a six-month Community Development Certificate of Deposit from Boston Bank of Commerce.

The proceeds from the investment are automatically invested in one of the four Community Development Programs. All four of which benefit low and moderate-income areas and individuals.

Investment Test

Investment Test Rating: NOT RATED.

Service Test

Service Test Rating: NOT RATED.

In 1999, Liberty Bank & Trust participated in three seminars sponsored by the Chinese Cultural Center. The bank offered free passbook savings accounts to all students participating in

the Chung Yee School after-school program. The school is located in low-income geography and provides its services primarily to low and moderate-income students.

Description Service Delivery Systems**Branch Information**

Branch locations in the Boston MSA:

Location	ATM	FSB
21 Milk Street Boston, MA 02109		✓
681 Washington Street Boston, MA 02111		✓
FSB: Full Service Branch		

Special Programs

The State Office of Minority Business Assistance (SOMWBA) has certified Liberty Bank & Trust as a minority business enterprise.

Year-Over-Year at a Glance

	1999	2000
HMDA Applications Received	5	3
HMDA Loans Originated	3	2
Low-Income Applications Received	0	0
Low-Income Loans Originated	0	0

⁷¹ Based on most recent CRA Performance Evaluation by FDIC published 1999.



Source Documents

Community Reinvestment Act Performance
Evaluation, Federal Deposit Insurance
Corporation; April 26, 1999.

Annual CRA Report to the Commissioner of
Banks, Commonwealth of Massachusetts, 2000.

FFIEC HMDA Aggregate & Disclosure
Software Version 2.0, Board of the Governors of
the Federal Reserve System; 2000.

1999 Linked Deposit Report to the Mayor of the
City of Boston, NobleAssociates; June 2000.

Liberty Bank website
<http://www.liberty-bank.com/>

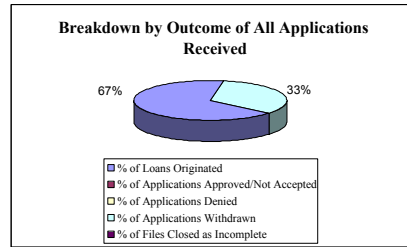
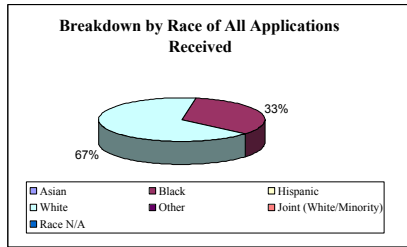
General Bank website
<http://www.generalbank.com/>

Liberty Bank Lending Information - HMDA

2000

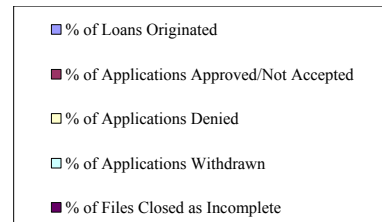
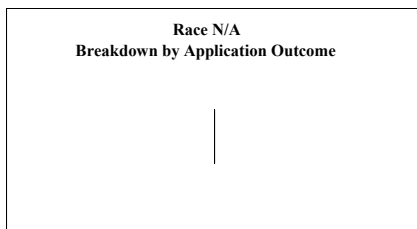
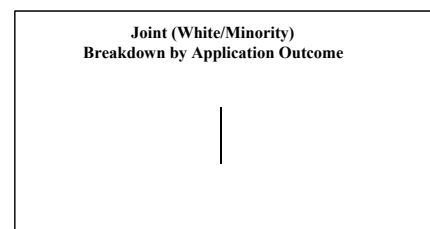
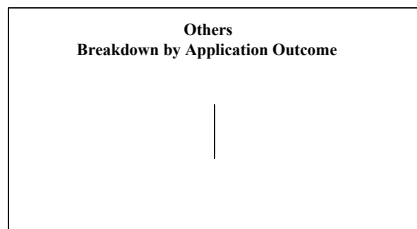
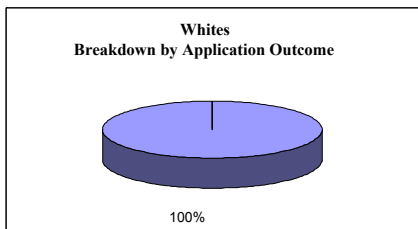
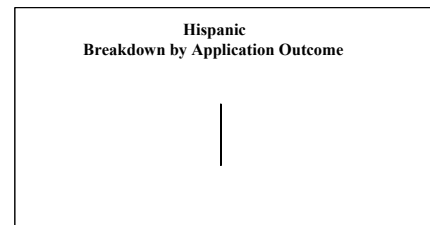
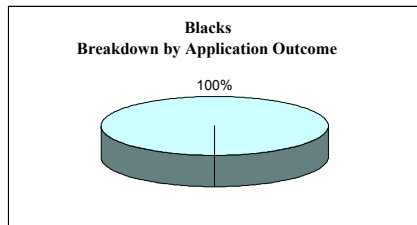
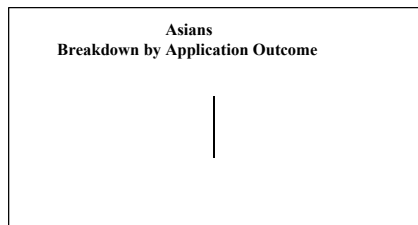
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black	1	33%	0	0%	0	0%	0	0%	1	100%	0	0%
Hispanic	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	2	67%	2	100%	0	0%	0	0%	0	0%	0	0%
Other	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	3	100%	2	67%	0	0%	0	0%	1	33%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

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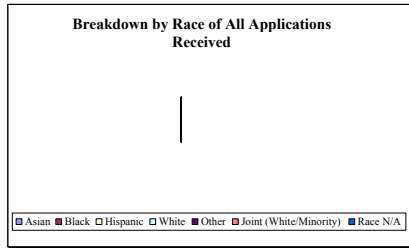


Liberty Bank & Trust Low-Income Mortgage Information

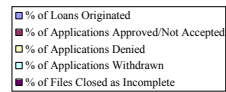
2000

Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Hispanic	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Other	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.

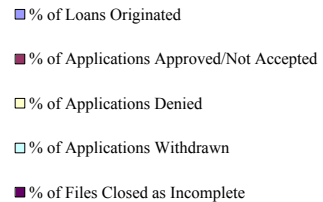
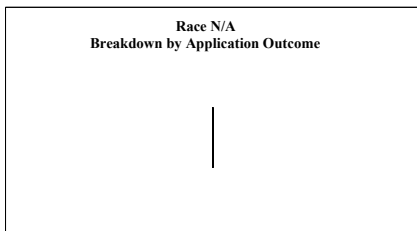
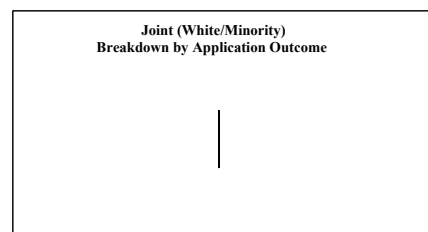
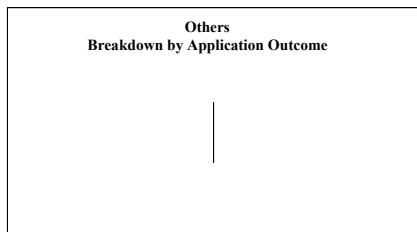
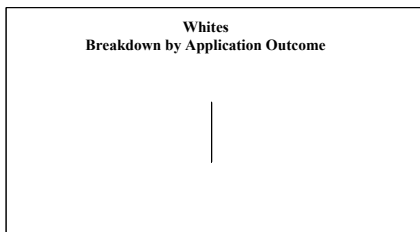
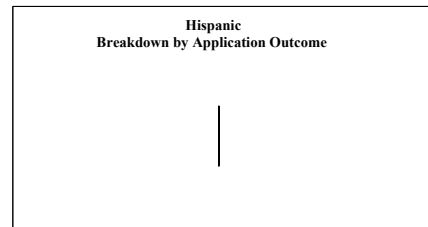
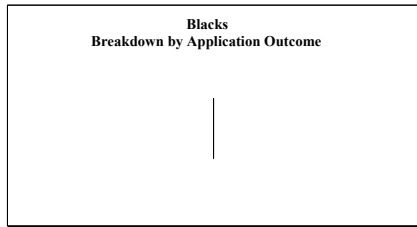
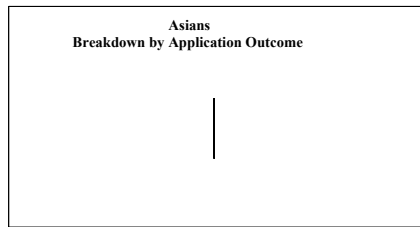


Breakdown by Outcome of All Applications Received



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.



Compared against the MSA Aggregate Total

2000

Liberty Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Asian	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Black	1	0.05%	0	0.00%	0	0.00%	0	0.00%	1	0.63%	0	0.00%
Hispanic	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
White	2	0.00%	2	0.01%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	3	0.00%	2	0.00%	0	0.00%	0	0.00%	1	0.02%	0	0.00%

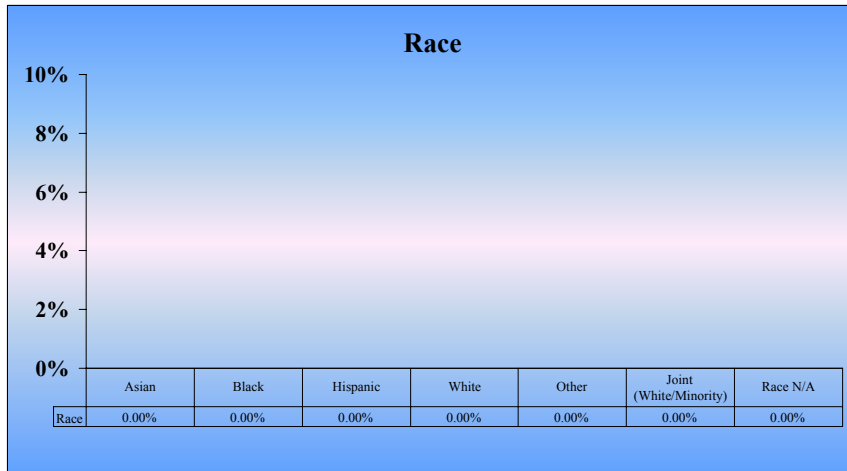
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Liberty Bank Low-Income Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Asian	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Black	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Hispanic	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
White	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%

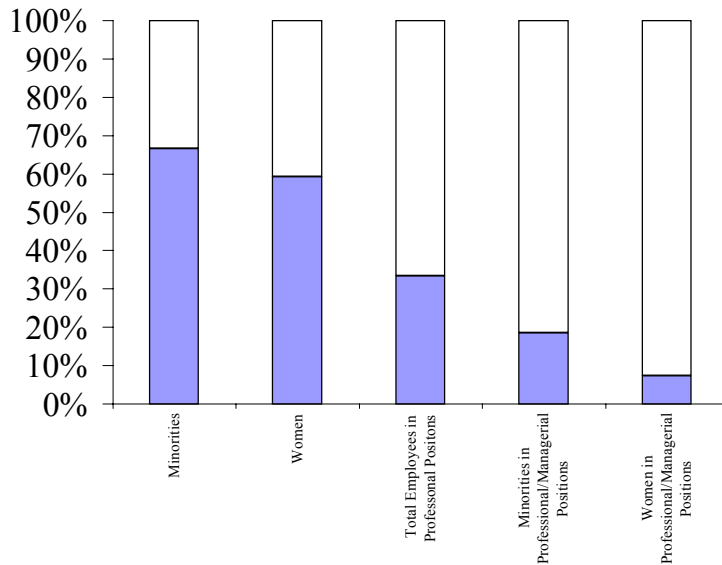
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Liberty Bank Employment Numbers

	Number of Employees	Percent of Total Employees
Total	27	
Minorities	18	67%
Women	16	59%
Total Employees In Professional Positions	9	33%
Minorities in Professional or Managerial Positions	5	19%
Women in Professional or Managerial Positions	2	7%

Liberty Bank



This chart illustrates the percentage of employees in each category measured against the total employee population. For example, the category **Minorities** represents the percentage of employees reported as minorities, regardless of gender, measured against the total population of bank employees; the category of **Minorities** in professional/managerial positions is the total number of reported minorities in professional/managerial positions, regardless of gender, when measured against the total population of bank employees. For raw number comparison see table above.

Liberty Bank and Trust Company Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans												Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans								
A			B			C			D			E			& E		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's
			41	93%	7769	19	90%	2329				2	67%	447	4	100%	455
						1	5%	150									
			3	7%	304	1	5%	230				1	33%	360			
						1	100%	100									
			1	100%	309												
			1	100%	108												

Liberty Bank and Trust Company Loan Information by Census Tract

[illegible]

MA/SUFFOLK/0920.00

LOAN ORIGINATED	1	100%	53
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0922.00

LOAN ORIGINATED	1	100%	195
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0923.00

LOAN ORIGINATED	1	100%	197
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1003.00

LOAN ORIGINATED	1	100%	268
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Liberty Bank and Trust Company Loan Information by Census Tract

[illegible]

Liberty Bank and Trust Company Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																				
Home Purchase Loans															Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans											
A			B			C			D			E			& E					
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's			
			1	100%	240															
						1	100%	125												
			2	100%	432	1	100%	184												
			3	100%	587										1	100%	116			

Liberty Bank and Trust Company Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1106.02

LOAN ORIGINATED	1	100%	80
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1301.00

LOAN ORIGINATED	3	100%	559
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1303.00

LOAN ORIGINATED	1	100%	240
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1304.01

LOAN ORIGINATED	1	100%	256	1	100%	195
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Liberty Bank and Trust Company Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans												Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans								
A			B			C			D			E			& E		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's
			2	100%	337												
			2	67%	209	2	100%	221									
			1	33%	91												
			3	75%	517	2	100%	252									
			1	25%	105												
			9	100%	1797	5	100%	569							1	100%	90

Liberty Bank and Trust Company Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1403.00

LOAN ORIGINATED	1	100%	173	1	100%	182
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1404.00

[illegible]



Mellon Bank

**Overview**

Mellon Bank
One Mellon Place
Pittsburgh, PA

New England Regional Headquarters:
135 Santilli Highway
Everett, MA

Description

Mellon Bank, N.A. is a wholly owned subsidiary of Mellon Bank Corporation, a bank holding company with \$43 billion in assets. Mellon Bank is headquartered in Pittsburgh, Pa and serves Pennsylvania and parts of New Jersey. Mellon's two core businesses include investment and banking services. Mellon offers its own affordable mortgage product. Mellon is also a large corporate and institutional bank with clients across the country and throughout the world.

Principal Officers**CEO**

Martin McGuinn
500 Grant Street
One Mellon Place
Pittsburgh, PA
412-234-4981

CFO

Michael Bryson
500 Grant Street
One Mellon Place
Pittsburgh, PA
412-234-5000

Compliance Officer

John Chesko
500 Grant Street
One Mellon Place
Pittsburgh, PA
412-234-5000

Employees

Number of Employees	NA
Number of Employees in Massachusetts	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches (New England Region) - Total	1
Branches within Boston PSMA	1
Number of ATMs	2
Number of Free Standing ATMs	1

CRA Rating

Rating Agency	FDIC
Most Recent Rating	1997
Overall Rating	OUTSTANDING ⁷²
Lending Test Rating	OUTSTANDING
Investment Test Rating	OUTSTANDING
Service Test Rating	HIGH SATISFACTORY

⁷² Based on most recent CRA Performance Evaluation by OCC published 1997.



Discussion

Overall Rating: OUTSTANDING⁷³

In the year 2000, Mellon maintained no retail presence in New England. Mellon Bank provides corporate and institutional services both nationally and globally. As such, Mellon Bank has provided proposals to the City of Boston. No HMDA or low-income mortgage information is available for Mellon Bank within the Boston MSA. Reports and information are available for those areas served by Mellon. Following is an overview of the CRA data for Mellon Bank N.A. focusing on CRA reportable data in the Philadelphia, Pennsylvania MSA.

Lending Test

Lending Test Rating: OUTSTANDING⁷⁴

General Responsiveness to Credit Needs

Mellon is the fourth largest HMDA reportable lender in its assessment area. Mellon maintains a high percentage (88%) of loans within its assessment area and above average market share positions in the low and moderate-income census tracts. The volume of lending in low and moderate-income census tracts is more than six times that of its overall market share.

Mellon serves most of Pennsylvania and small portion of southern New Jersey. Delivery systems are accessible to essentially all portions of the assessment area.

Community Development Lending:

Mellon has been active in the origination of community development loans in the Philadelphia MSA. During the evaluation period, 44 loans for \$15.8 million were originated. The bank is a leader in providing funds for affordable housing with loans to groups such as Greater Germantown Housing, Philadelphia Housing Development and Kensington Action Now. In addition, Mellon was active in other areas of community development through loans to community

service organizations and economic development loans to relocate businesses to an enterprise zone within Philadelphia.

Innovative or Flexible Lending Practices:

The following flexible credit practices are only offered in the Philadelphia area.

- Philadelphia Home Improvement Loan Program
- The Philadelphia Homeownership Rehabilitation Program

Investment Test

Investment Test Rating: OUTSTANDING⁷⁵

Mellon has demonstrated an excellent record of providing community development investments in the Philadelphia MSA.

During the evaluation period, Mellon provided a significant number and dollar volume of qualified investments. This included \$7.8 million in investments and grants for organizations within the MSA and an additional \$74 million for statewide investments that also benefited this area.

Service Test

Service Test Rating: HIGH SATISFACTORY⁷⁶

Mellon's delivery systems are readily accessible to essentially all portions of the assessment area. Eighteen percent of Mellon's branches and stand-alone ATMs are located in low or moderate-income census tracts.

All products and services are consistent throughout Mellon's assessment area. Mellon offers a full range of retail products to customers and small business owners. Branch hours vary based on needs of the location.

Throughout the assessment area, employees of Mellon volunteer and serve on boards of community organizations which provide community development services.

⁷³ Based on most recent CRA Performance Evaluation by OCC published 1997.

⁷⁴ Ibid.

⁷⁵ Ibid.

⁷⁶ Ibid.



Year-Over-Year at a Glance

	1999	2000
HMDA Applications Received	499	369
HMDA Loans Originated	450	293
Low-Income Applications Received	223	168
Low-Income Loans Originated	197	127

Mellon Bank, N.A. HMDA reportable and low-income applications and originations decreased substantially from 1999 to 2000 in this MSA.



Source Documents

Community Reinvestment Act Performance Evaluation, Office of the Comptroller of the Currency; November 26, 1997.

FFIEC HMDA Aggregate & Disclosure Software Version 2.0, Board of the Governors of the Federal Reserve System; 2000.

1999 Linked Deposit Report to the Mayor of the City of Boston, NobleAssociates; June 2000.

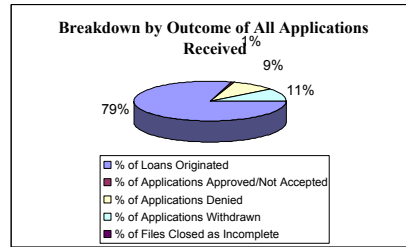
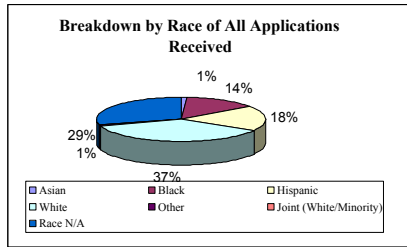
Mellon Bank web site
<http://www.mellon.com/>

Mellon Bank, N.A. Lending Information - HMDA

2000

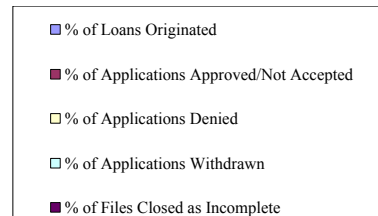
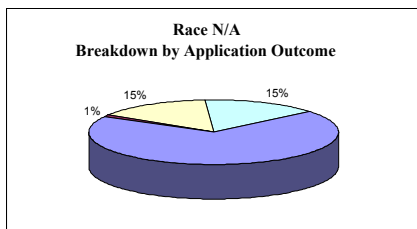
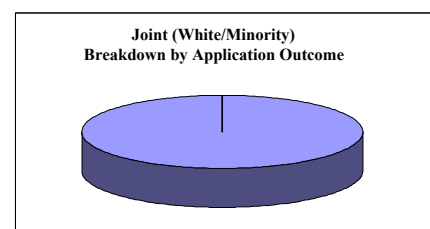
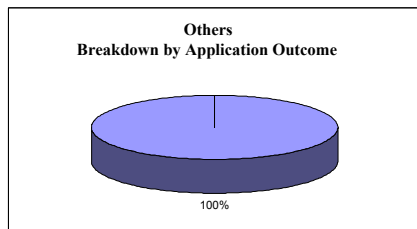
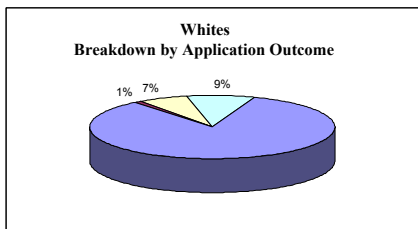
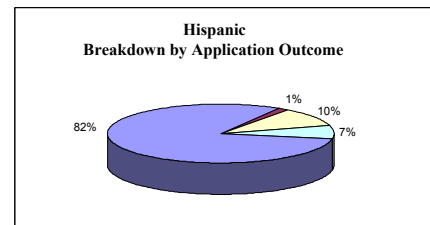
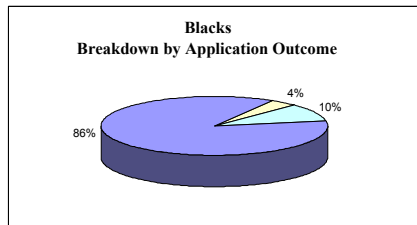
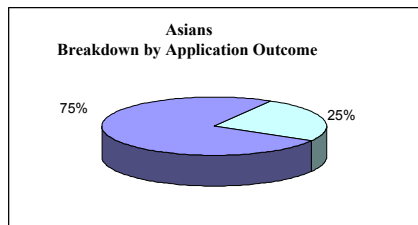
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	4	1%	3	75%	0	0%	0	0%	1	25%	0	0%
Black	51	14%	44	86%	0	0%	2	4%	5	10%	0	0%
Hispanic	68	18%	55	81%	1	1%	7	10%	5	7%	0	0%
White	135	37%	113	84%	1	1%	9	7%	12	9%	0	0%
Other	3	1%	3	100%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	1	0%	1	100%	0	0%	0	0%	0	0%	0	0%
Race N/A	107	29%	74	69%	1	1%	16	15%	16	15%	0	0%
Total	369	100%	293	79%	3	1%	34	9%	39	11%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

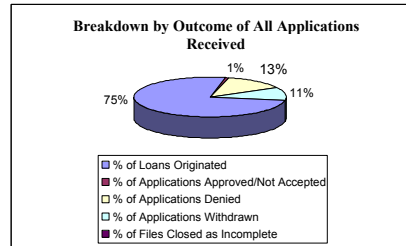
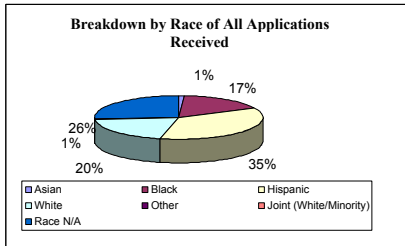


Mellon Bank, N.A. Low-Income Mortgage Information

2000

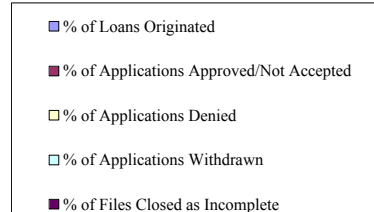
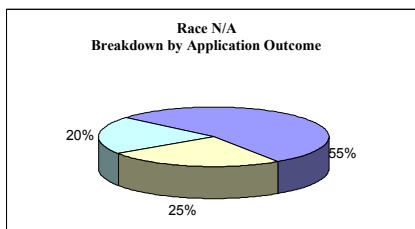
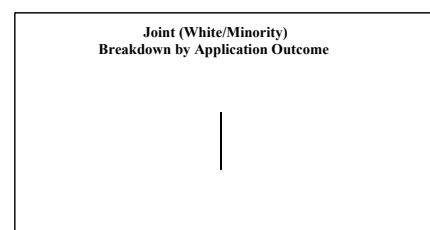
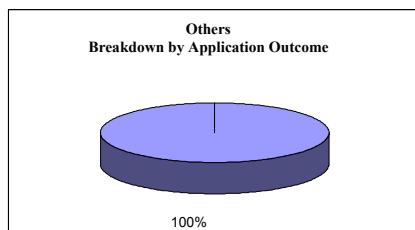
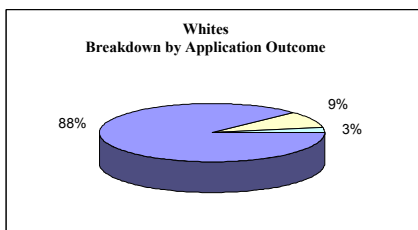
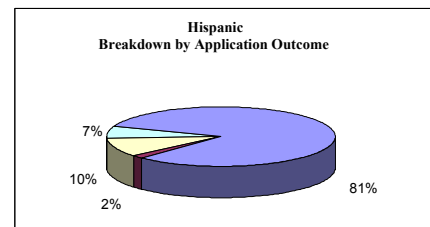
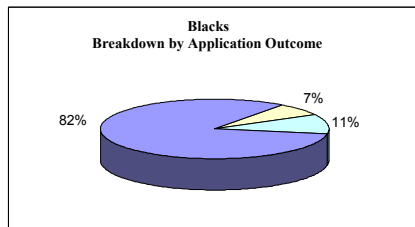
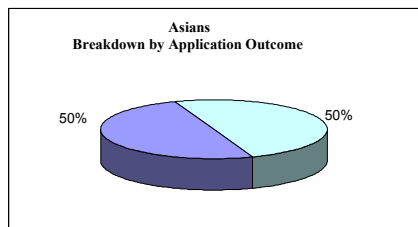
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	2	1%	1	50%	0	0%	0	0%	1	50%	0	0%
Black	28	17%	23	82%	0	0%	2	7%	3	11%	0	0%
Hispanic	60	36%	49	82%	1	2%	6	10%	4	7%	0	0%
White	33	20%	29	88%	0	0%	3	9%	1	3%	0	0%
Other	1	1%	1	100%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	44	26%	24	55%	0	0%	11	25%	9	20%	0	0%
Total	168	100%	127	76%	1	1%	22	13%	18	11%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.





HMDA and Low-Income Compared against the MSA Aggregate Total

No data available



Employment Information

No data available



Loan Information By Census Tract

No data available



Sovereign Bank



Overview

Sovereign Bank New England
75 State Street
Boston, MA

Parent company: Sovereign Bancorp

Description

Sovereign Bank established a full banking presence within the City of Boston on June 15, 2001 and within the Boston MSA on July 25, 2001. Sovereign Bank established market share in New England by purchasing over 280 branches from Fleet Bank. There was no mortgage sales force in place until the early fall of 2001 since none of the previous sales force employed by Fleet/BankBoston was divested with the transaction. In certain areas of lending, such as community development, the lending team was attending to reconciling the divested assets. It was not until 2001 that the Commercial Real Estate team was able to begin reviewing new transactions.

Principal Officers

CEO

John Hamill
75 State Street
Boston, MA
617-757-3434

President/New England

Joseph Campanelli
75 State Street
Boston, MA
617-757-3444

Chief Compliance Officer

Jack V. Killen
Villanova, PA
610-526-6226

Employees

Number of Employees	2493
Number of Employees in Massachusetts	2493
Percentage of Women Employees	77%
Percentage of Minority Employees	2.7%

Branches

Number of Branches - Total	285
Branches within Boston PSMA	29
Number of ATMs	20
Number of Free Standing ATMs	NA

CRA Rating

Rating Agency	OTS
Most Recent Rating	2000
Overall Rating	SATISFACTORY ⁷⁷
Lending Test Rating	HIGH SATISFACTORY
Investment Test Rating	LOW SATISFACTORY
Service Test Rating	LOW SATISFACTORY

⁷⁷ Based on most recent CRA Performance Evaluation by OTS for Sovereign Bank Massachusetts published 2000.



Discussion

Overall rating: SATISFACTORY⁷⁸

Lending Test

Lending Test Rating: LOW SATISFACTORY⁷⁹

It should be noted that Sovereign Bank established a full banking presence within the City of Boston on June 15, 2001 and within the Boston MSA on July 25, 2001. There was no mortgage sales force in place until the early fall of 2001, since none of the previous sales force employed by Fleet/BankBoston was divested with the transaction. In certain areas of lending, such as community development, the lending team was attending to reconciling the divested assets. It was not until 2001 that the Commercial Real Estate team was able to begin reviewing new transactions.

The following information was obtained from the "Community Investment Agreement" dated March 7, 2000. Sovereign Bank New England and the Community Advisory Committee generated this report.

General Responsiveness to Credit Needs

Sovereign Bank New England (SBNE) has made a commitment for the years 2000, 2001 and 2002 with the Community Advisory Committee (CAC) that contains specific goals for loans, investments, and services.

SBNE will negotiate with CAC in 2002 specific goals for 2003 and 2004.

SBNE will create a Commonwealth Advisory Committee for Massachusetts. This Committee will be responsible for monitoring and advising SBNE on the execution of the bank CRA plan as well as any specific agreements, including but not limited to The CAC agreement.

SBNE and the CAC in partnership have developed this Agreement and the following community investment programs that will provide financing for affordable housing and economic development projects for low and

moderate-income residents and areas in Massachusetts.

Responsiveness to Low and Moderate-Income Credit Needs

Sovereign Bank New England commits to lend a minimum of \$162 million in low and moderate-income mortgages in Massachusetts through the year 2002. The Bank will utilize ACORN and Soft Second mortgage programs that offer low cost and flexible credit underwriting criteria in addition to other affordable mortgage products. The bank agrees to lend \$75 Million of the \$162 Million to the ACORN and Soft Second mortgage programs.

The CAC will work with Sovereign to develop programs that help achieve common goals that will increase community access to affordable mortgages to low and moderate-income and minority borrowers.

The Bank will work to reduce loan defaults and foreclosures by contracting with counseling agencies on a fee-for-service basis that employs comprehensive pre and/or post purchase counseling programs.

Leadership in Community Development Loans

As part of Sovereign's commitment to New England, Sovereign will make available \$5 million annually in loans and investments in the Boston Empowerment Zone.

Sovereign commits to lend a minimum of \$97 million in community development financing in Massachusetts, during the term of this agreement, for affordable housing projects and commercial real estate sponsored by and for non-profit organizations. The Bank will target 60% of its commitment to housing projects and 40% to commercial real estate that will benefit LMI communities.

Sovereign will also participate in investment programs to develop low-income housing through federal and Massachusetts' low-income housing tax credit programs and historic tax credits. The goal for investments in the federal low-income housing tax credit program will be \$10 million by 2002.

⁷⁸ Based on most recent CRA Performance Evaluation by OTS for Sovereign Bank Massachusetts published 2000.

⁷⁹ Ibid.



Sovereign Bank New England will also contribute to community development activities amounting to at least \$250,000 in the year 2000 and at least \$500,000 annually in 2001 and 2002.

This grant will target:

- Affordable housing including home buyer and home owner counseling, the development of affordable rental and special needs housing, and related programs for low and moderate-income individuals;
- Community and economic development, including small business technical assistance, entrepreneur training, job training and workforce development programs as well as the development of commercial or industrial real estate;
- Economic education including credit counseling, and programs expanding access to credit and banking services for low and moderate-income and minority communities;
- Civil Rights related advocacy such as community organizing, diversity education, expanding awareness and understanding of racial and gender economic disparities, research and litigation to enforce civil rights laws, and other such efforts that can affect public policy and business practices.

Investment Test

Investment Test Rating: HIGH SATISFACTORY⁸⁰

Sovereign will invest \$2.0 million in equity positions through the year 2002 in community based equity and loan providers such as CDFI's CDCs, loan pools, and various collaboratives that serve at least 75% minority and women-owned businesses, and /or low and moderate-income owned businesses or businesses that serve low and moderate-income areas.

As part of Sovereign's commitment to New England, they will make available \$5 million annually in loans and investments in the Boston Empowerment Zone.

While virtually all of the community development loans were purchased from Fleet Boston Financial, the large dollar amount shows

that Sovereign made a financial commitment to the assessment area.⁸¹

Service Test

Service Test Rating: HIGH SATISFACTORY⁸²

Sovereign will commit to open all branches purchased in low and moderate-income areas for one year after the final divestiture closing date. Beyond that year, the bank will seek input from the Community Advisory Committee upon consideration and before filing for any branch closing in low and moderate-income areas or minority areas.

According to the Office of Thrift Supervision, more than one-fourth of offices in the assessment area are in low and moderate income geographies.

Description Service Delivery Systems

Sovereign commits to establish a goal of opening 10,000 basic banking accounts and free checking accounts by 2002 and thereafter in Massachusetts.

Sovereign will offer bilingual services consistent with the needs of various communities it serves.

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
1 Beacon Street Boston, MA		✓
67 Beacon Street Boston, MA		✓
3060 Washington Street Boston, MA		✓
125 Causeway Street Boston, MA		✓
One Federal Street Boston, MA		✓
61 Harrison Avenue Boston, MA		✓
100 Oliver Street Boston, MA		✓
552 Commonwealth Avenue		✓

⁸⁰ Rated by the Office of Thrift Supervision for the Boston, Worcester and Lawrence CMSA, September 2000.

⁸¹ Office of Thrift Supervision, Large Institution Performance Evaluation, 11/01/2000.

⁸² Ibid.



Boston, MA	
43 Kneeland Street	✓
Boston, MA	
6 Francis Street	✓
Boston, MA	
287 Hanover Street	✓
Boston, MA	
61 Arlington Street	✓
Boston, MA	
800 Boylston Street	✓
Boston, MA	
950 American Legion Hwy	✓
Boston, MA	
164 Northern Avenue	✓
Boston, MA	
Two South Station Concourse	✓
Boston, MA	
75 State Street	✓
Boston, MA	
125 Summer Street	✓
Boston, MA	
2 Westland Street	✓
Boston, MA	
30 Winter Street	✓
Boston, MA	
427 Rutherford Avenue	✓
Charlestown, MA	
Martin Luther King Blvd	✓
Roxbury, MA	
474 Broadway	✓
South Boston, MA	
1850 Centre Street	✓
West Roxbury, MA	
2 Meridian Street	✓
East Boston, MA	
2 Morrissey Blvd	✓
Dorchester, MA	
572 Freeport Street	✓
Dorchester, MA	
494 Gallivan Blvd	✓
Dorchester, MA	
585 Columbia Road	✓
Dorchester, MA	

FSB: Full Service Branch

Year-Over-Year at a Glance

	1999	2000
HMDA Applications Received	NA	557
HMDA Loans Originated	NA	441
Low-Income Applications Received	NA	9
Low-Income Loans Originated	NA	5

Due to the acquisition of a large number of branches, Sovereign Bank New England began retail branch services in the Boston MSA in the year 2000. No comparison to the previous year is available for this bank in New England.



Source Documents

Community Reinvestment Act Performance
Evaluation, Office of Thrift Supervision;
November 1, 2000.

Community Investment Agreement, Community
Advisory Committee and Sovereign Bank New
England; March 7, 2000.

FFIEC HMDA Aggregate & Disclosure
Software Version 2.0, Board of the Governors of
the Federal Reserve System; 2000.

1999 Linked Deposit Report to the Mayor of the
City of Boston, NobleAssociates; June 2000.

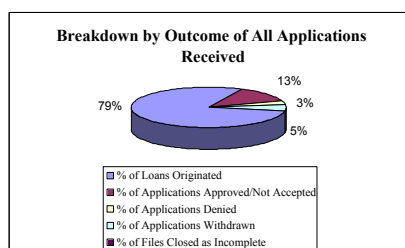
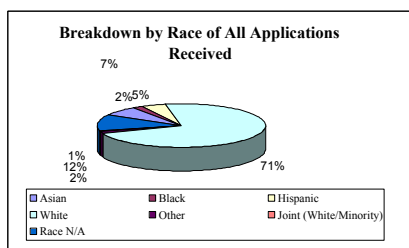
Sovereign Bank website
<http://www.sovereignbank.com/>

Sovereign Bank Lending Information - HMDA

2000

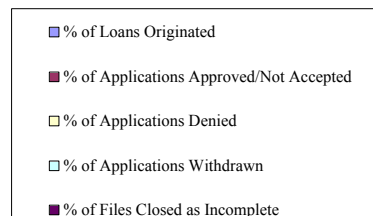
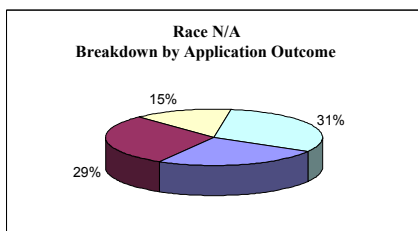
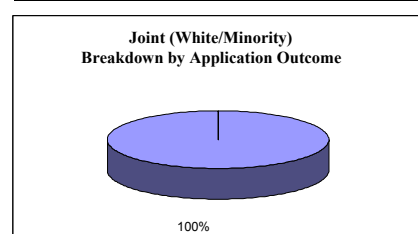
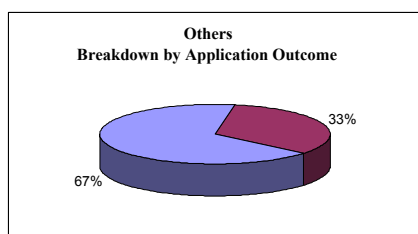
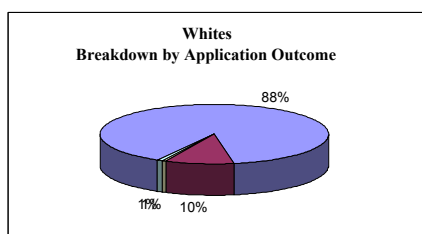
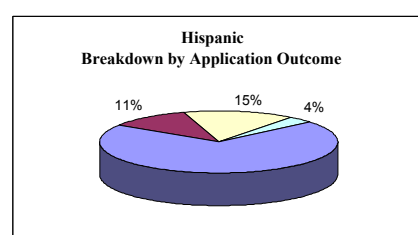
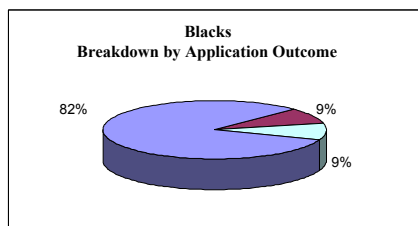
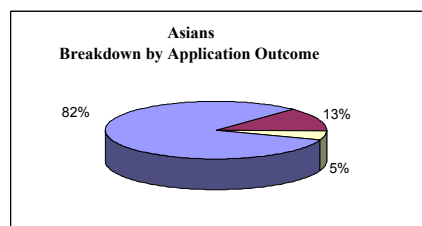
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	38	7%	31	82%	5	13%	2	5%	0	0%	0	0%
Black	11	2%	9	82%	1	9%	0	0%	1	9%	0	0%
Hispanic	27	5%	19	70%	3	11%	4	15%	1	4%	0	0%
White	401	72%	356	89%	39	10%	3	1%	3	1%	0	0%
Other	9	2%	6	67%	3	33%	0	0%	0	0%	0	0%
Joint (White/Minority)	3	1%	3	100%	0	0%	0	0%	0	0%	0	0%
Race N/A	68	12%	17	25%	20	29%	10	15%	21	31%	0	0%
Total	557	100%	441	79%	71	13%	19	3%	26	5%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

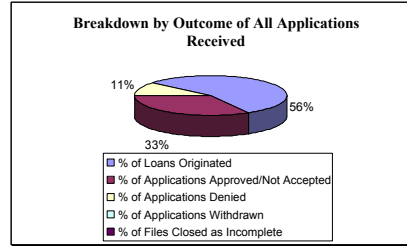
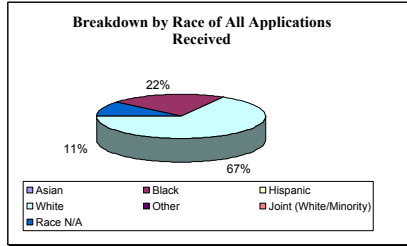
The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.



Sovereign Bank Low-Income Mortgage Information 2000

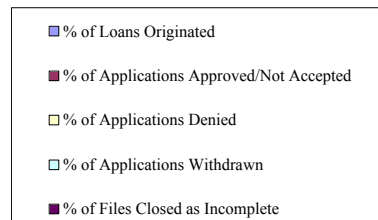
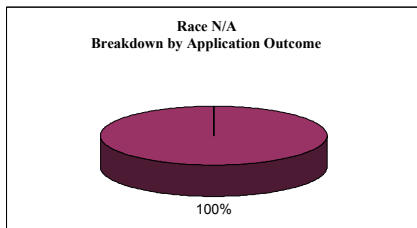
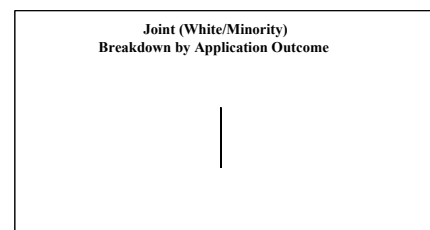
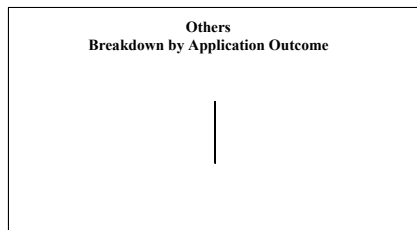
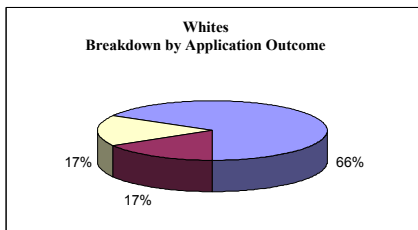
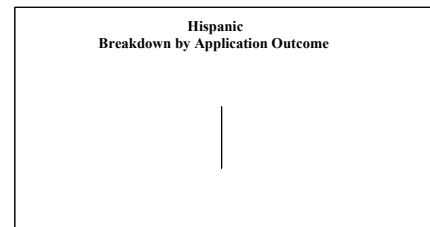
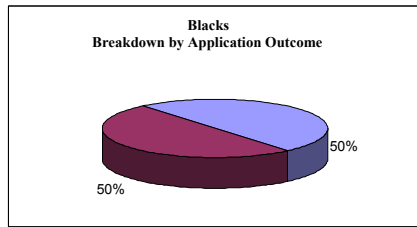
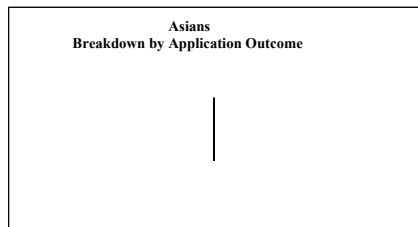
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black	2	22%	1	50%	1	50%	0	0%	0	0%	0	0%
Hispanic	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	6	67%	4	67%	1	17%	1	17%	0	0%	0	0%
Other	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	1	11%	0	0%	1	100%	0	0%	0	0%	0	0%
Total	9	100%	5	56%	3	33%	1	11%	0	0%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.



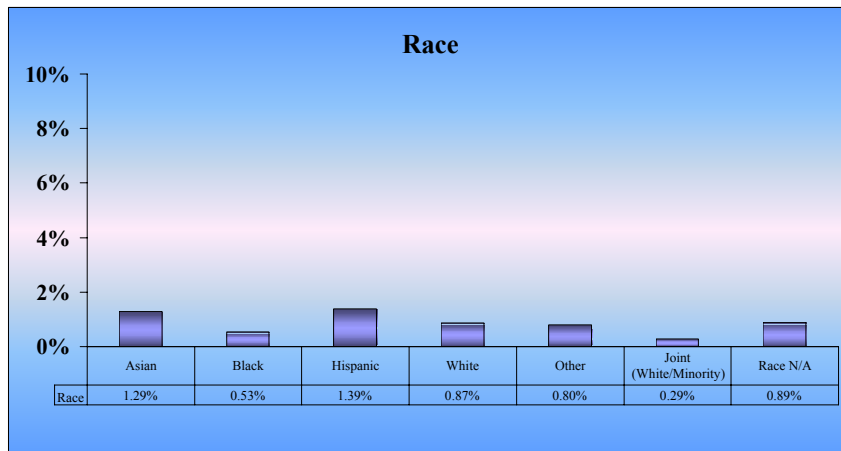
Compared against the MSA Aggregate Total

2000

Sovereign Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Asian	38	1.29%	31	1.38%	5	2.23%	2	0.81%	0	0.00%	0	0.00%
Black	11	0.53%	9	0.73%	1	0.63%	0	0.00%	1	0.63%	0	0.00%
Hispanic	27	1.39%	19	1.46%	3	2.36%	4	1.21%	1	0.65%	0	0.00%
White	401	0.87%	356	0.99%	39	1.18%	3	0.08%	3	0.12%	0	0.00%
Other	9	0.80%	6	0.78%	3	2.68%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	3	0.29%	3	0.36%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	68	0.89%	17	0.36%	20	2.42%	10	0.93%	21	2.19%	0	0.00%
Total	557	0.89%	441	0.94%	71	1.47%	19	0.32%	26	0.63%	0	0.00%

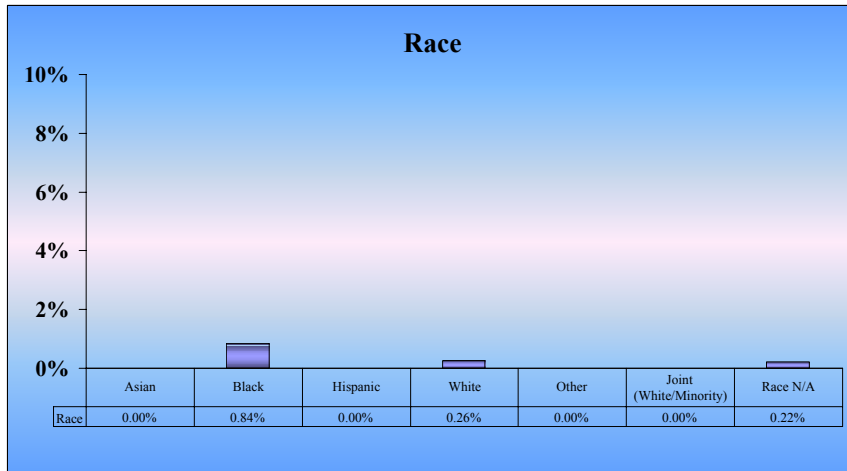
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Sovereign Bank Low-Income Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Asian	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Black	2	0.84%	1	0.75%	1	7.14%	0	0.00%	0	0.00%	0	0.00%
Hispanic	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
White	6	0.26%	4	0.25%	1	0.76%	1	0.26%	0	0.00%	0	0.00%
Other	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	1	0.22%	0	0.00%	1	2.70%	0	0.00%	0	0.00%	0	0.00%
Total	9	0.25%	5	0.22%	3	1.34%	1	0.15%	0	0.00%	0	0.00%

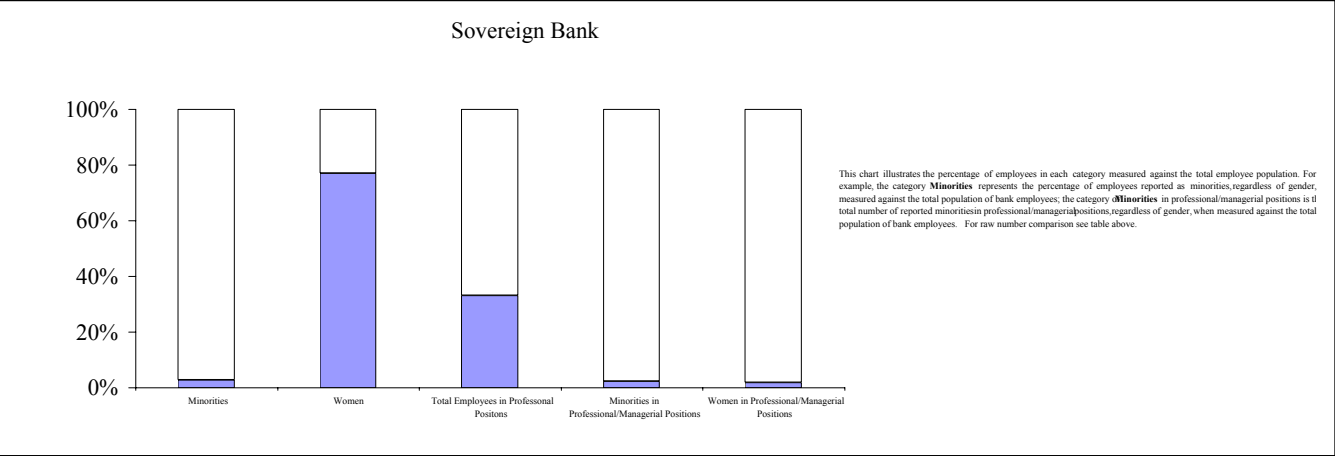
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Sovereign Employment Numbers

The Employment Numbers listed below are for Sovereign Bank - Pennsylvania.

	Number of Employees	Percent of Total Employees
Total	2,493	
Minorities	66	3%
Women	1,922	77%
Total Employees In Professional Positions	827	33%
Minorities in Professional or Managerial Positions	56	2%
Women in Professional or Managerial Positions	45	2%



Sovereign Bank

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement			Loans on Dwellings			Non Occupant Loans 1-4		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's

MSA TOTAL																			
LOAN ORIGINATED	3	60%	808	56	74%	11369	32	53%	7884	31	42%	891	3	100%	4129	10	56%	3686	
APPROVED, NOT ACCEPTED				10	13%	1899	7	12%	965	6	8%	245				3	17%	400	
APP DENIED	1	20%	281	5	7%	834	15	25%	1930	26	36%	1180				4	22%	791	
APP WITHDRAWN	1	20%	50	5	7%	1209	6	10%	1133	10	14%	508				1	6%	100	
FILES CLOSED FOR INCOMPLETENESS																			

MA/SUFFOLK/0001.00

LOAN ORIGINATED	1	100%	36
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0002.02

LOAN ORIGINATED	1	50%	9
APPROVED, NOT ACCEPTED			
APP DENIED	1	50%	50
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0003.00

LOAN ORIGINATED				2	100%	63
APPROVED, NOT ACCEPTED	1	100%	200			
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Sovereign Bank

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement			Loans on Dwellings			Non Occupant Loans 1-4		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's

MA/SUFFOLK/0108.00

LOAN ORIGINATED	2	100%	302	2	100%	72
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0201.00

LOAN ORIGINATED	2	100%	165	1	100%	650
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0203.00

LOAN ORIGINATED	1	100%	190
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0303.00

[illegible]

Sovereign Bank

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement			Loans on Dwellings			Non Occupant Loans 1-4		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's

MA/SUFFOLK/0305.00

LOAN ORIGINATED	1	100%	124			
APPROVED, NOT ACCEPTED				1	100%	179
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0405.00

LOAN ORIGINATED	1	100%	300	1	100%	385
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0407.00

LOAN ORIGINATED	1	100%	324
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN	1	100%	250
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0502.00

LOAN ORIGINATED	1	100%	194
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Sovereign Bank

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement			Loans on Dwellings			Non Occupant Loans 1-4		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's

MA/SUFFOLK/0504.00

LOAN ORIGINATED	1	100%	50
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0509.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	1	100%	17	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/0511.00

LOAN ORIGINATED	2	100%	454	1	100%	745
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN	2	100%	55			
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0601.00

LOAN ORIGINATED						
APPROVED, NOT ACCEPTED						
APP DENIED				2	100%	318
APP WITHDRAWN	1	100%	10			
FILES CLOSED FOR INCOMPLETENESS						

Sovereign Bank

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement			Loans on Dwellings			Non Occupant Loans 1-4		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's

MA/SUFFOLK/0603.00

LOAN ORIGINATED	1	100%	88
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0604.00

LOAN ORIGINATED			
APPROVED, NOT ACCEPTED	1	100%	136
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0605.00

LOAN ORIGINATED	1	100%	140
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0608.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED				
APP WITHDRAWN	1	100%	100	
FILES CLOSED FOR INCOMPLETENESS				

Sovereign Bank

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement			Loans on Dwellings			Non Occupant Loans 1-4		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's

MA/SUFFOLK/0611.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	1	100%	150	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/0613.00

LOAN ORIGINATED	1	100%	79
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0701.00

LOAN ORIGINATED	1	50%	238
APPROVED, NOT ACCEPTED			
APP DENIED	1	50%	351
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0703.00

LOAN ORIGINATED	1	100%	25
APPROVED, NOT ACCEPTED			
APP DENIED	1	100%	60
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Sovereign Bank

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement			Loans on Dwellings			Non Occupant Loans 1-4		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's

MA/SUFFOLK/0705.00

[illegible]

MA/SUFFOLK/0706.00

LOAN ORIGINATED	1	100%	60
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0708.00

LOAN ORIGINATED	1	100%	15
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0709.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED				
APP WITHDRAWN	1	100%	468	
FILES CLOSED FOR INCOMPLETENESS				

Sovereign Bank

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement			Loans on Dwellings			Non Occupant Loans 1-4		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's

MA/SUFFOLK/0805.00

LOAN ORIGINATED	1	100%	140
APPROVED, NOT ACCEPTED	1	100%	55
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0810.00

LOAN ORIGINATED	3	100%	352	1	100%	98
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0813.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED	1	100%	10	
APP DENIED				
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/0814.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED				
APP WITHDRAWN	1	100%	155	
FILES CLOSED FOR INCOMPLETENESS				

Sovereign Bank

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement			Loans on Dwellings			Non Occupant Loans 1-4		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's

MA/SUFFOLK/0815.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	1	100%	20	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/0817.00

LOAN ORIGINATED	1	100%	172	1	25%	66	1	100%	66
APPROVED, NOT ACCEPTED									
APP DENIED				3	75%	145			
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/0820.00

LOAN ORIGINATED	1	100%	55
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0901.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	1	100%	55	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

Sovereign Bank

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement			Loans on Dwellings			Non Occupant Loans 1-4		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's

MA/SUFFOLK/0906.00

LOAN ORIGINATED	1	100%	130
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0910.00

LOAN ORIGINATED	1	100%	40
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0911.00

LOAN ORIGINATED	1	100%	278	2	100%	85
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0913.00

LOAN ORIGINATED							
APPROVED, NOT ACCEPTED	1	100%	146				
APP DENIED				1	100%	202	
APP WITHDRAWN							
FILES CLOSED FOR INCOMPLETENESS							

Sovereign Bank

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement			Loans on Dwellings			Non Occupant Loans 1-4		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's

MA/SUFFOLK/0916.00

LOAN ORIGINATED	1	100%	6
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0917.00

LOAN ORIGINATED	1	100%	155
APPROVED, NOT ACCEPTED			
APP DENIED	1	100%	281
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/0919.00

LOAN ORIGINATED						
APPROVED, NOT ACCEPTED						
APP DENIED	1	100%	38	1	50%	25
APP WITHDRAWN				1	50%	10
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/0923.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	1	100%	15	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

Sovereign Bank

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement			Loans on Dwellings			Non Occupant Loans 1-4		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's

MA/SUFFOLK/0924.00

LOAN ORIGINATED	1	33%	15	1	100%	184	1	100%	15
APPROVED, NOT ACCEPTED									
APP DENIED	2	67%	25						
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/1002.00

LOAN ORIGINATED	1	100%	15
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1003.00

LOAN ORIGINATED			
APPROVED, NOT ACCEPTED			
APP DENIED	1	50%	35
APP WITHDRAWN	1	50%	3
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1004.00

LOAN ORIGINATED						
APPROVED, NOT ACCEPTED						
APP DENIED	1	100%	130	1	100%	82
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Sovereign Bank

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement			Loans on Dwellings			Non Occupant Loans 1-4		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's

MA/SUFFOLK/1005.00

LOAN ORIGINATED	1	100%	174	1	100%	35
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1006.01

[illegible]

MA/SUFFOLK/1006.02

LOAN ORIGINATED	1	100%	81	1	100%	10	1	100%	81
APPROVED, NOT ACCEPTED									
APP DENIED									
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/1007.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED	1	100%	140	
APP DENIED				
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

Sovereign Bank

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement			Loans on Dwellings			Non Occupant Loans 1-4		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's

MA/SUFFOLK/1008.00

LOAN ORIGINATED				1	50%	22
APPROVED, NOT ACCEPTED						
APP DENIED	1	100%	259	1	50%	90
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1009.00

LOAN ORIGINATED	1	100%	10
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1010.01

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED	1	100%	157	
APP DENIED				
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/1011.01

LOAN ORIGINATED			
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN	1	100%	50
FILES CLOSED FOR INCOMPLETENESS			

Sovereign Bank

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1104.01

LOAN ORIGINATED	1	100%	323
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1104.02

LOAN ORIGINATED	1	100%	30			
APPROVED, NOT ACCEPTED				1	100%	10
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1106.01

LOAN ORIGINATED							
APPROVED, NOT ACCEPTED							
APP DENIED				1	100%	30	
APP WITHDRAWN	1	100%	50				
FILES CLOSED FOR INCOMPLETENESS							

MA/SUFFOLK/1106.02

LOAN ORIGINATED	1	100%	69	1	100%	30
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Sovereign Bank

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement			Loans on Dwellings			Non Occupant Loans 1-4		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's

MA/SUFFOLK/1205.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	1	100%	170	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/1206.00

LOAN ORIGINATED	1	100%	30
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1207.00

LOAN ORIGINATED							
APPROVED, NOT ACCEPTED							
APP DENIED	1	100%	50		1	100%	50
APP WITHDRAWN							
FILES CLOSED FOR INCOMPLETENESS							

MA/SUFFOLK/1301.00

LOAN ORIGINATED	1	100%	25
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Sovereign Bank

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement			Loans on Dwellings			Non Occupant Loans 1-4		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's

MA/SUFFOLK/1302.00

LOAN ORIGINATED	1	100%	221
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1303.00

LOAN ORIGINATED				1	100%	100
APPROVED, NOT ACCEPTED	1	100%	300			
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1304.01

LOAN ORIGINATED	1	100%	153	1	50%	38
APPROVED, NOT ACCEPTED						
APP DENIED				1	50%	166
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1304.02

LOAN ORIGINATED	1	100%	180
APPROVED, NOT ACCEPTED			
APP DENIED	1	100%	6
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Sovereign Bank

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement			Loans on Dwellings			Non Occupant Loans 1-4		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's

MA/SUFFOLK/1401.01

LOAN ORIGINATED	2	100%	476		
APPROVED, NOT ACCEPTED					
APP DENIED			1	100%	50
APP WITHDRAWN					
FILES CLOSED FOR INCOMPLETENESS					

MA/SUFFOLK/1401.02

LOAN ORIGINATED	1	100%	250
APPROVED, NOT ACCEPTED			
APP DENIED	1	100%	6
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1402.00

LOAN ORIGINATED	1	100%	229	1	100%	131
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1403.00

LOAN ORIGINATED				1	50%	50
APPROVED, NOT ACCEPTED						
APP DENIED	1	100%	30	1	50%	5
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

Sovereign Bank

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement			Loans on Dwellings			Non Occupant Loans 1-4		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's

MA/SUFFOLK/1404.00

LOAN ORIGINATED	2	100%	297
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1601.00

LOAN ORIGINATED			
APPROVED, NOT ACCEPTED			
APP DENIED	1	50%	15
APP WITHDRAWN	1	50%	158
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1602.00

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	1	100%	109	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

MA/SUFFOLK/1604.00

LOAN ORIGINATED	1	100%	20
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Sovereign Bank

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement			Loans on Dwellings			Non Occupant Loans 1-4		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's

MA/SUFFOLK/1605.00

LOAN ORIGINATED	1	100%	87	1	100%	34	1	100%	87
APPROVED, NOT ACCEPTED									
APP DENIED									
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

MA/SUFFOLK/1606.00

LOAN ORIGINATED							
APPROVED, NOT ACCEPTED							
APP DENIED	3	100%	91		1	100%	16
APP WITHDRAWN							
FILES CLOSED FOR INCOMPLETENESS							

MA/SUFFOLK/1701.00

[illegible]

MA/SUFFOLK/1702.00

[illegible]

Sovereign Bank

Loan Information by Census Tract

[illegible]

MA/SUFFOLK/1703.00

LOAN ORIGINATED			
APPROVED, NOT ACCEPTED	1	100%	50
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1704.00

LOAN ORIGINATED	1	100%	70	1	100%	11
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

MA/SUFFOLK/1705.00

LOAN ORIGINATED			
APPROVED, NOT ACCEPTED	1	50%	50
APP DENIED	1	50%	65
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1706.00

LOAN ORIGINATED	1	50%	222	2	100%	306
APPROVED, NOT ACCEPTED	1	50%	279			
APP DENIED						
APP WITHDRAWN	1	100%	50			
FILES CLOSED FOR INCOMPLETENESS						

Sovereign Bank

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement			Loans on Dwellings			Non Occupant Loans 1-4		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's

MA/SUFFOLK/1708.00

LOAN ORIGINATED	2	67%	110
APPROVED, NOT ACCEPTED			
APP DENIED	1	33%	70
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1802.00

LOAN ORIGINATED	1	100%	85
APPROVED, NOT ACCEPTED			
APP DENIED	1	100%	130
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

MA/SUFFOLK/1803.00

[illegible]

MA/SUFFOLK/1804.00

LOAN ORIGINATED	1	100%	135
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Sovereign Bank

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans						Refinancings			Home Improvement			Loans on Dwellings			Non Occupant Loans 1-4		
FHA, FSA/RHS & VA			Conventional														
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's

MA/SUFFOLK/1805.00

LOAN ORIGINATED	1	100%	146
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN	1	100%	146
FILES CLOSED FOR INCOMPLETENESS			



Wainwright Bank



Overview

Wainwright Bank & Trust
63 Franklin Street
Boston, MA

Description

Wainwright Bank & Trust is a \$373 million state chartered bank headquartered in Boston whose primary focus is commercial lending.

Principal Officers:

CEO

Jan Miller
63 Franklin Street
Boston, MA
617-478-4000

CFO

James Barrett
63 Franklin Street
Boston, MA
617-478-4000

Chief Compliance Officer

Pam Feingold
63 Franklin Street
Boston, MA
617-478-4000

Employees

Number of Employees	107
Number of Employees in Massachusetts	107
Percentage of Women Employees	60%
Percentage of Minority Employees	30%

Branches

Number of Branches - Total	7
Branches within Boston PSMA	2
Number of ATMs	7
Number of Free Standing ATMs	0

CRA Rating

Rating Agency	FDIC
Most Recent Rating	1999
Overall Rating	OUTSTANDING ⁸³
Lending Test Rating	HIGH SATISFACTORY ⁸⁴
Investment Test Rating	OUTSTANDING ⁸⁵
Service Test Rating	OUTSTANDING ⁸⁶

⁸³ Based on most recent CRA Performance Evaluation by FDIC published 1999.

⁸⁴ Ibid.

⁸⁵ Ibid.

⁸⁶ Ibid.



Discussion

Overall rating: OUTSTANDING⁸⁷

Lending Test

Lending Test Rating: HIGH SATISFACTORY⁸⁸

General Responsiveness to Credit Needs

The bank is primarily a commercial lender with a very strong emphasis on community development lending (see detailed information for 2000 below, and in appendix). During the 1999 review by the FDIC, the bank's HMDA lending inside its assessment area was adequate. According to this report, there has been a steady decline in HMDA lending since 1997. This is in-line with the bank's change in focus to commercial lending.

Responsiveness to Low and Moderate-Income Credit Needs

Wainwright does participate in and support the following programs and development projects:

- Affordable: 75% Median Income Boston & Cambridge Properties - 6 Mortgages totaling \$668,800
- 1st Time Homebuyer: 135% HUD Median Income - 10 Mortgages totaling \$1,381,175
- Adjustable Rate: 40 mortgages totaling \$11,396,200

Large Institution Affordable Housing Development and Preservation: As an institution, Wainwright Bank participated in or made contributions to eight affordable housing development and preservation projects. Of these eight projects, four were within the City of Boston, totaling more than \$8,200,000.⁸⁹

Leadership in Community Development

Loans

According to the 1999 FDIC report and the "2000 Annual CRA Report to the Commissioner of Banks" (see detailed 2000 information below). Wainwright has continued to demonstrate exceptional effort in designing and participating

in a variety of flexible and innovative programs that are aimed at meeting the needs of individuals throughout the City of Boston and the Commonwealth of Massachusetts.

In the 2000 CRA report to the Commissioner of Banks, Wainwright reported the extension of various lines of credit totaling more than \$2,000,000 to various charitable research, counseling and shelter services. Most of these organizations were in the City of Boston.⁹⁰

Investment Test

Investment Test Rating: OUTSTANDING⁹¹

According to the 1999 FDIC report, Wainwright Bank & Trust's level of complexity of qualified investments is exceptional for a bank of its size.

During 2000, Wainwright participated in the "Ruggles Street LP" which developed 43 units of housing for formerly homeless elders. The Equity Investment amount was \$4,550,000.

Service Test

Service Test Rating: OUTSTANDING⁹²

Description Service Delivery Systems

Wainwright Bank & Trust participates in the MCBC Basic Banking program.

⁸⁷ Based on most recent CRA Performance Evaluation by FDIC published by 1999.

⁸⁸ Ibid.

⁸⁹ See Appendix for detail list.

⁹⁰ See appendix for complete list.

⁹¹ Based on most recent CRA Performance Evaluation by FDIC published by 1999.

⁹² Ibid.

**Branch Information**

Branch locations in the Boston MSA:

Location	ATM	FSB
63 Franklin Street Boston, 02110		✓
One Broadway Cambridge, 02142		✓
44 Brattle Street Cambridge, 02138		✓
155 Dartmouth Street Boston, 02116		✓
176 Alewife Brook Pkwy Cambridge, 02138*		✓
687 Centre Street Boston, 02130*		✓
One Church Street Watertown, 02472		✓
647 Mass Ave. Cambridge, 02138		✓

FSB: Full Service Branch

*Branches and ATMs located in low and moderate-income geographies.

Year-Over-Year at a Glance

	1999	2000
HMDA Applications Received	56	45
HMDA Loans Originated	47	40
Low-Income Applications Received	2	3
Low-Income Loans Originated	2	2

HMDA reportable applications decreased by 20% from 1999 to 2000 resulting in a 14% decrease in HMDA loans originated.

Special Programs

Wainwright Bank & Trust is a national leader in financing shelters for the homeless. Community Development Loans comprise an impressive one-fifth of its loan portfolio. Wainwright supplies over 60% of the financing for housing for persons with HIV/AIDS, even though it does less than 1% of the overall loan activity in Greater Boston.

Additional Information

The bank's commitment to diversity is across-the-board, with staff at all levels reflecting the community and the customer base. Half of the banking officers are women, and fifty percent of the board of directors is comprised of women, minorities, gays and lesbians. The staff is cumulatively fluent in 17 languages.



Wainwright Bank Appendix A

Affordable Housing Development and Preservation

Program	Project Name	Sponsor	Location	# of Units Market Affordable	Institution Participation
In House	Veterans Benefit	VBCDC	Lynn, MA	29 (Affordable)	\$144,000
In House	St. George	S. End	Boston, MA Lower Roxbury	15 (Affordable)	\$5,490,000
In House	Cornerstone Co-housing	Cornerstone LLC	Cambridge, MA	4(Affordable) 28(Market)	\$4,512,000
In House	Methunion Manor	Methunion	Boston	99(Affordable)	\$200,000
FHLB	Bowdoin Manor	Comm. Boston Land Trust	Boston	121(Affordable)	\$250,000
In House	Watertown Community Housing	Watertown Community Housing	Watertown	4(Affordable)	\$9,000
In House	Washington Minot	Washington Minot	Boston	6(Affordable) 5(Market)	\$2,287,500

**Wainwright Bank Appendix B****Community Development Loans**

Project	Location	Description	Type	Institution Participation
Silent Spring	Newton	Breast Cancer Research	Working Capital Line	\$100,000
Bridge Over Troubled Waters	Boston	Facility for Affordable Housing	Working Capital Line	\$200,000
Mass Housing Partnership	Boston	Funding for Affordable Housing	Working Capital Line	\$1,000,000
International Institute of Boston	Boston	Housing & Services for Immigrants Refugees	Working Capital Line	\$600,000
Massachusetts Asian AIDS Prevention Services	Boston	Services for people with AIDS	Working Capital Line	\$35,000
Haley House	Boston	Homeless Shelter	Corporate Credit Card	\$7,500
AIDS Housing Corporation	Boston	Services for people with AIDS	Corporate Credit Card	\$10,000
Help Horizons Com Inc.	Boston	Counseling	Corporate Credit Card	\$20,000
Mass Breast Cancer Coalition	Randolph	Counseling	Corporate Credit Card	\$12,500
Boston Living Center	Boston	Services for people with AIDS	Corporate Credit Card	\$5,000
Crittendon Hastings House	Boston	Services for single parents	Corporate Credit Card	\$12,000
NSACA	Boston	Counseling	Corporate Credit Card	\$30,000
Cambridge YWCA	Cambridge	Services for Women & Children	Corporate Credit Card	\$3,000
Franciscan Counseling Services	Boston	Counseling	Corporate Credit Card	\$5,000
Greater Boston Food Bank	Boston	Food Bank	Corporate Credit Card	\$22,000
St. Anthony's Shrine	Boston	Counseling Shelter	Corporate Credit Card	\$6,000
CAB Health & Recovery	Danvers & Boston	Alcohol Treatment & Drug Treatment	Corporate Credit Card	\$15,000
N.E. Women's Support	Boston	Women's Services	Corporate Credit Card	\$3,000
Total				\$2,086,000



Source Documents

Community Reinvestment Act Performance
Evaluation. Federal Deposit Insurance
Corporation; December 29, 1999.

Annual CRA Report to Commissioner of Banks,
Commonwealth of Massachusetts; 2000.

FFIEC HMDA Aggregate & Disclosure
Software Version 2.0, Board of Governors of the
Federal Reserve System; 2000.

1999 Linked Deposit Report to the Mayor of the
City of Boston, NobleAssociates; June 2000.

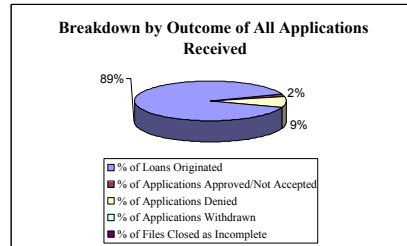
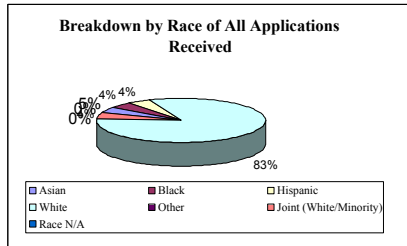
Wainwright Bank website
<http://www.wainwrightbank.com/>

Wainwright Bank Lending Information - HMDA

2000

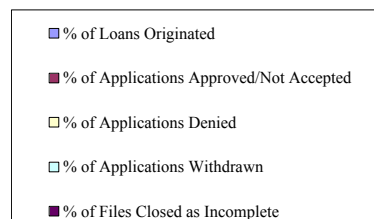
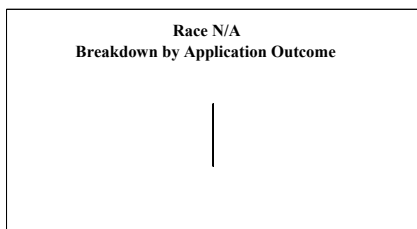
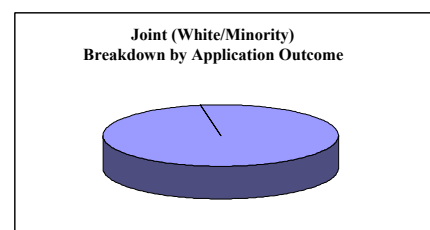
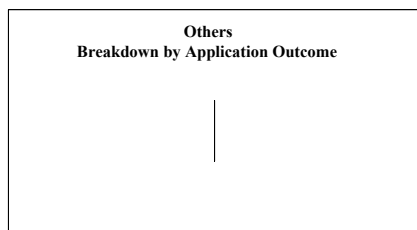
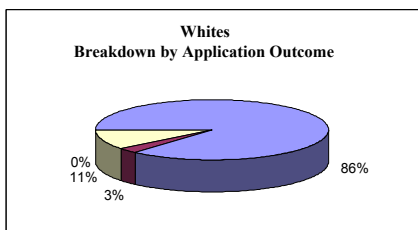
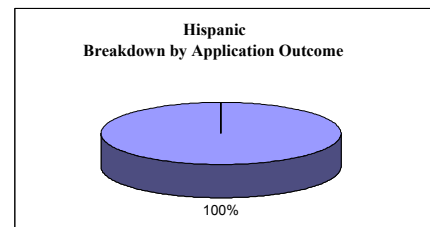
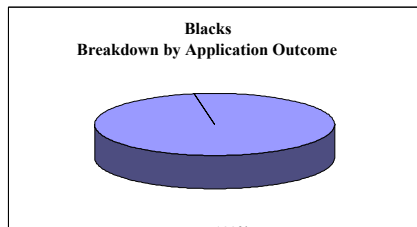
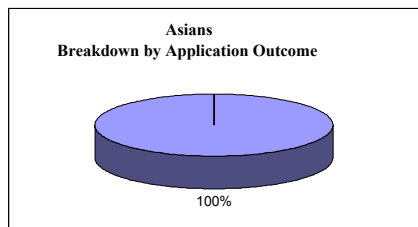
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	2	4%	2	100%	0	0%	0	0%	0	0%	0	0%
Black	2	4%	2	100%	0	0%	0	0%	0	0%	0	0%
Hispanic	2	4%	2	100%	0	0%	0	0%	0	0%	0	0%
White	37	82%	32	86%	1	3%	4	11%	0	0%	0	0%
Other	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	2	4%	2	100%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	45	100%	40	89%	1	2%	4	9%	0	0%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

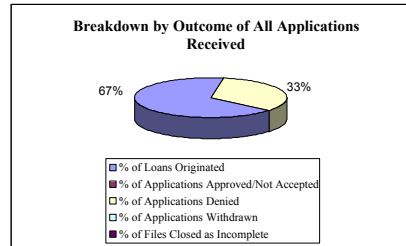
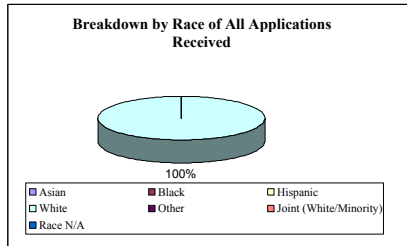


Wainwright Bank Low-Income Mortgage Information

2000

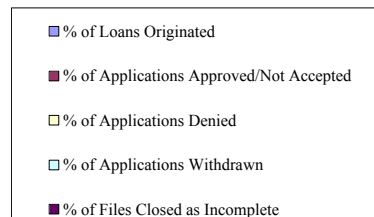
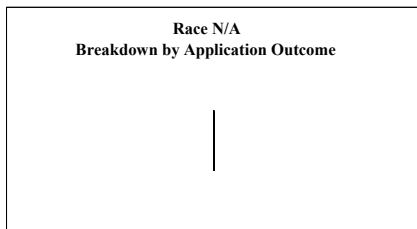
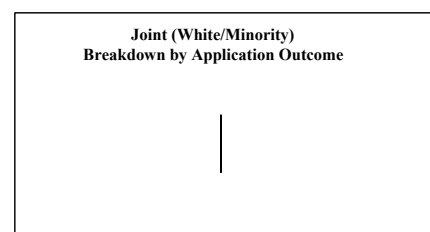
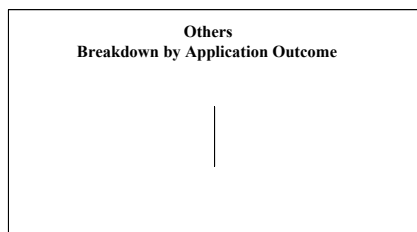
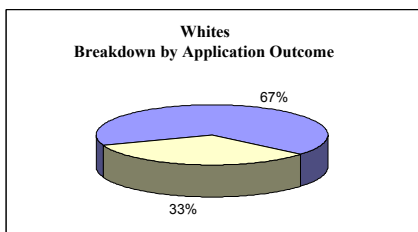
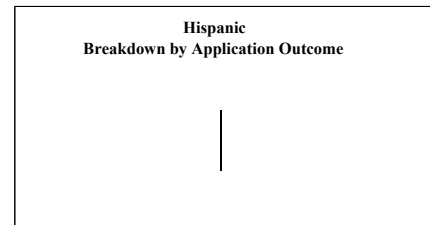
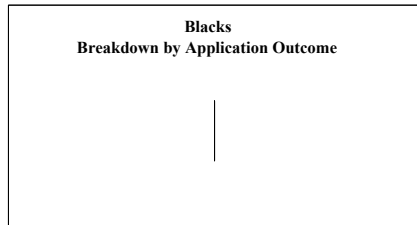
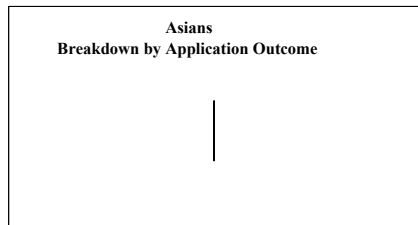
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Hispanic	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	3	100%	2	67%	0	0%	1	33%	0	0%	0	0%
Other	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	3	100%	2	67%	0	0%	1	33%	0	0%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.



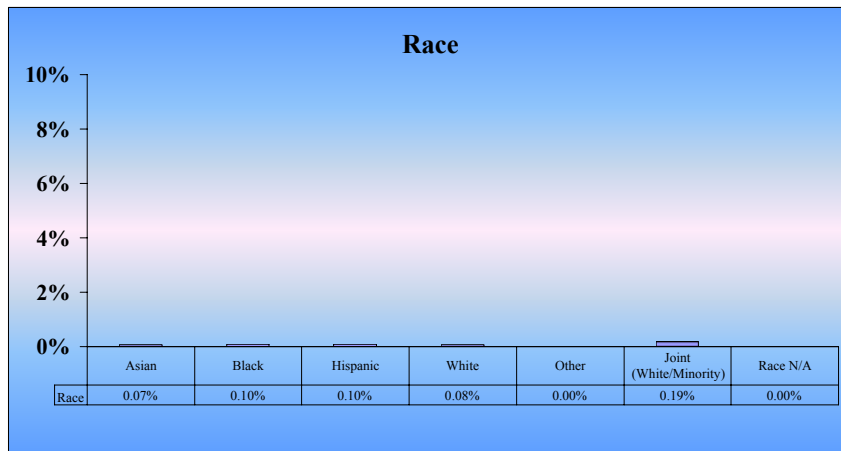
Compared against the MSA Aggregate Total

2000

Wainwright Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Asian	2	0.07%	2	0.09%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Black	2	0.10%	2	0.16%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Hispanic	2	0.10%	2	0.15%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
White	37	0.08%	32	0.09%	1	0.03%	4	0.11%	0	0.00%	0	0.00%
Other	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	2	0.19%	2	0.24%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	45	0.07%	40	0.09%	1	0.02%	4	0.07%	0	0.00%	0	0.00%

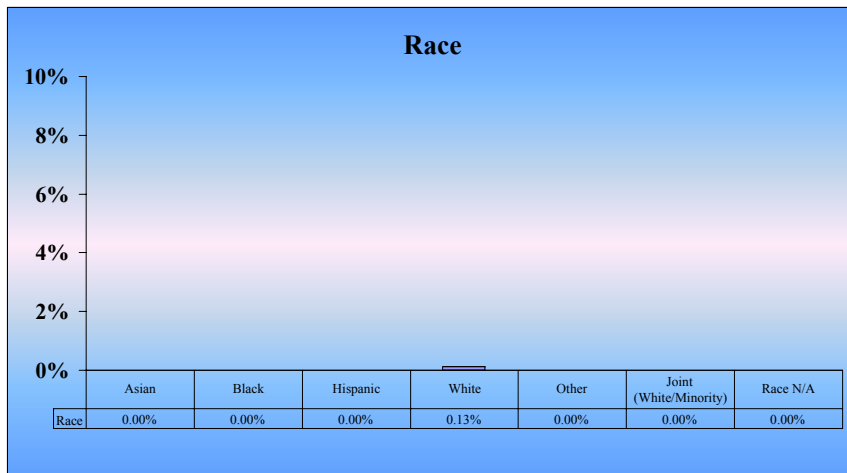
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Wainwright Bank Low-Income Mortgage Information

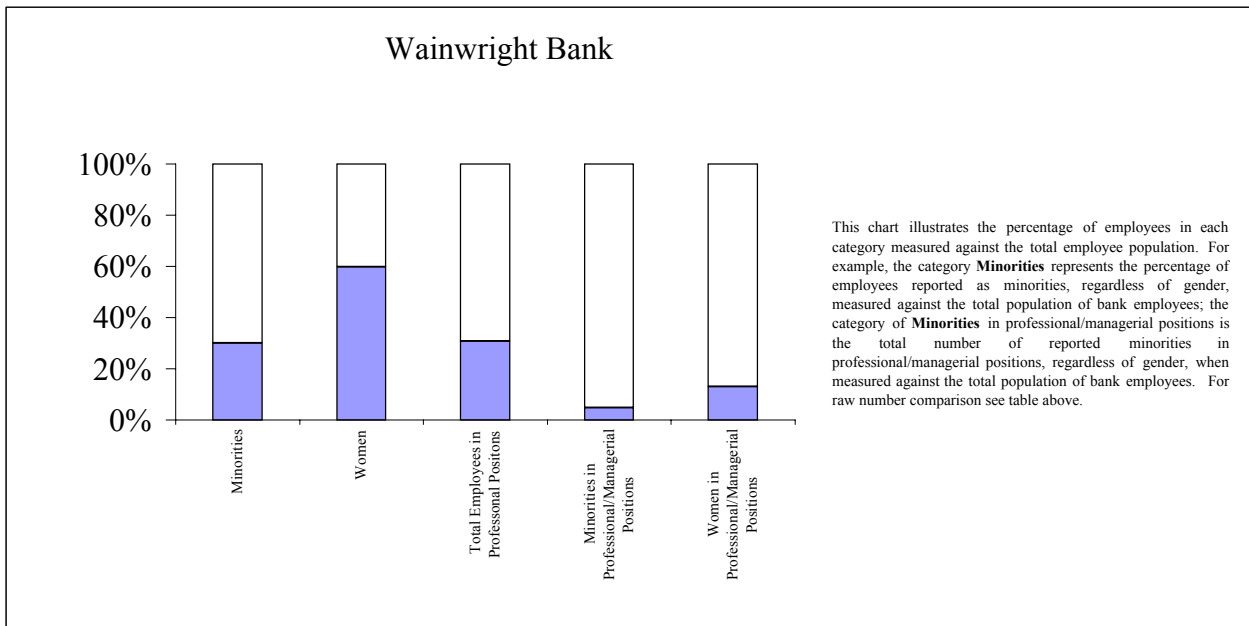
Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Asian	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Black	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Hispanic	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
White	3	0.13%	2	0.13%	0	0.00%	1	0.26%	0	0.00%	0	0.00%
Other	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	3	0.08%	2	0.09%	0	0.00%	1	0.15%	0	0.00%	0	0.00%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Wainwright Bank Employment Information

	Number of Employees	Percent of Total Employees
Total	107	
Minorities	32	30%
Women	64	60%
Total Employees In Professional Positions	33	31%
Minorities in Professional or Managerial Positions	5	5%
Women in Professional or Managerial Positions	14	13%



Wainwright Bank and Trust Company

Loan Information by Census Tract

Loans on 1-to-4 Family Dwellings																	
Home Purchase Loans																	
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans			Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D		
A			B			C			D			E			& E		
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's
			25	89%	4294	10	77%	2556				5	100%	2503	4	80%	532
			1	4%	250												
			2	7%	315	3	23%	595							1	20%	170
			1	100%	172												
			1	100%	95												
			1	100%	100												

[illegible]

LOAN ORIGINATED	1	100%	400
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

LOAN ORIGINATED	1	100%	750
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED	1	100%	250	
APP DENIED				
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

LOAN ORIGINATED	1	100%	900
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

[illegible]

LOAN ORIGINATED	1	100%	427
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN	1	100%	200
FILES CLOSED FOR INCOMPLETENESS			

LOAN ORIGINATED	1	100%	928
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

LOAN ORIGINATED	1	100%	212
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

LOAN ORIGINATED	1	100%	113
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

[illegible]

LOAN ORIGINATED	1	100%	350
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

LOAN ORIGINATED	1	100%	152	1	100%	225	1	100%	152
APPROVED, NOT ACCEPTED									
APP DENIED									
APP WITHDRAWN									
FILES CLOSED FOR INCOMPLETENESS									

LOAN ORIGINATED	2	100%	189
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

LOAN ORIGINATED	1	100%	225	1	100%	435
APPROVED, NOT ACCEPTED						
APP DENIED						
APP WITHDRAWN						
FILES CLOSED FOR INCOMPLETENESS						

[illegible]

LOAN ORIGINATED	1	100%	200
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

LOAN ORIGINATED	1	100%	150	
APPROVED, NOT ACCEPTED				
APP DENIED		1	100%	225
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

LOAN ORIGINATED	1	100%	125
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

LOAN ORIGINATED	1	100%	105
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

[illegible]

LOAN ORIGINATED							
APPROVED, NOT ACCEPTED							
APP DENIED	1	100%	170		1	100%	170
APP WITHDRAWN							
FILES CLOSED FOR INCOMPLETENESS							

LOAN ORIGINATED	1	100%	115
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

LOAN ORIGINATED	1	100%	104
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

LOAN ORIGINATED	1	100%	116
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

Loans on 1-to-4 Family Dwellings																					
Home Purchase Loans															Loans on Dwellings for 5 or more families			Non Occupant Loans 1-4 Family Dwellings from columns A, B, C, D & E			
FHA, FSA/RHS & VA			Conventional			Refinancings			Home Improvement Loans												
A			B			C			D			E									
Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's	Number	%	\$000's				
			1	100%	255																
			1	100%	60	1	100%	140								1	100%	60			
			3	100%	472														1	100%	70
						2	100%	399											1	100%	250

[illegible]

[illegible]

LOAN ORIGINATED	1	100%	174
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			

LOAN ORIGINATED				
APPROVED, NOT ACCEPTED				
APP DENIED	1	100%	165	
APP WITHDRAWN				
FILES CLOSED FOR INCOMPLETENESS				

LOAN ORIGINATED	1	100%	190
APPROVED, NOT ACCEPTED			
APP DENIED			
APP WITHDRAWN			
FILES CLOSED FOR INCOMPLETENESS			



Appendix A



Appendix A

List of Source Documents

Boston Bank of Commerce

Community Reinvestment Evaluation, Federal Deposit Insurance Corporation; November 15, 1999.

FFIEC HMDA Aggregate & Disclosure Software Version 2.0, Board of the Governors of the Federal Reserve System; 2000.

1999 Linked Deposit Report to the Mayor of the City of Boston, NobleAssociates; June 2000.

Boston Bank of Commerce web site.

Boston Private Bank

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FFIEC HMDA Aggregate & Disclosure Software Version 2.0, Board of the Governors of the Federal Reserve System, 2000.

Boston Private Bank website
<http://www.bostonprivatebank.com/>

Century Bank & Trust

Community Reinvestment Act Performance Evaluation, Federal Deposit Insurance Corporation, June 21, 1999.

Annual CRA Report to the Commissioner of Banks, Commonwealth of Massachusetts, 2000.

FFIEC HMDA Aggregate & Disclosure Software Version 2.0, Board of the Governors of the Federal Reserve System, 2000.

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Appendix B



Appendix B

Community Reinvestment Act

Overview

The Community Reinvestment Act (CRA) was placed into law in 1977. Its primary purpose was to prevent redlining. It requires banks and other savings institutions to take positive steps in meeting the credit needs of all the communities to whom they provide services. This includes those in low and moderate-income areas.

The Federal Reserve Board, Office of the Comptroller of the Currency, Office of Thrift Supervision and the Federal Deposit Insurance Corporation, review and evaluate whether banks are meeting the credit needs of the communities being served. This evaluation, depending on its outcome, can impact an institution's ability to expand through opening new branches or merging with another institution.

The CRA gives the areas being served the ability to intervene in the process of regulation. Some of the concerned citizens groups may include: community groups, non-profit development organizations, small business organizations, and public agencies. They may make specific recommendations as to specific areas of improvement, depending on the performance of the financial institution in question.

Programs are then developed that list the steps that must be taken in order for the institution to improve its lending record in low and moderate-income areas.

The CRA has freed up more than a trillion dollars in loans targeted to residents and businesses located in urban and rural neighborhoods. Financial institutions have also found that the CRA can provide additional, profitable business, so they take it very seriously.

CRA examinations are conducted regularly. The examiners look at five categories:

1. Ascertainment of community needs.
2. Marketing and types of credit offered and extended.
3. Geographic distribution and record of opening and closing offices.
4. Discrimination and other illegal practices.

5. Community Development.

The exam period varies from six months, for an institution that has an unsatisfactory rating; to twelve months for a billion dollar, or larger, national bank; to several years for smaller institutions regulated by the Office of the Comptroller of the Currency (OCC).

The Financial Institutions Reform, Recovery and Enforcement Act of 1989 (FIRREA), formerly known as the S&L Bailout Bill, made three major changes to the CRA:

- Ratings for institutions were changed. Previously there had been a scale of one to five; one being "outstanding", and five being "substantial non-compliance". The general (or overall) ratings are now reported in four categories: (Ratings within specific test areas continue to be reported in five categories as outlined in Appendix C).
Outstanding
Satisfactory
Needs Improvement
Substantial Non-Compliance
- All ratings are now disclosed to the institutions and to the public. CRA evaluations are now published.
- As of January, 1997, large banks are being evaluated based on their lending, service and investment activities. Larger institutions are being required to disclose information about their small business lending activity, and their mortgage lending activity outside of metropolitan area



Appendix C



Appendix C

Rating Definitions

Lending Performance

Outstanding

Excellent responsiveness to credit needs in its assessment area(s) taking into consideration the number and amount of home mortgage, small business, small farm, and consumer loans, if applicable, in its assessment area(s). A substantial majority of its loans are made in its assessment area. An excellent geographic distribution of loans in its assessment area(s). An excellent record of serving the credit needs of highly economically disadvantaged areas in its assessment area(s), low-income individuals, or businesses (including farms). Extensive use of innovative or flexible lending practices, in a safe and sound manner, to address the credit needs of low or moderate-income individuals or geographies. Is a leader in making community development loans.

High Satisfactory

Good responsiveness to the credit needs in its assessment area(s), taking into account the number and amount of home mortgage, small business, small farm, and consumer loans, if applicable, in its assessment area(s). A high percentage of loans are made in its assessment area(s). A good geographic distribution of loans in its assessment area(s). A good distribution, particularly in its assessment area(s), of loans among individuals of different income levels and businesses of different sizes (including farms), given the product lines of the bank. A good record of serving the credit needs of highly economically disadvantaged areas in its assessment area(s), low-income individuals, or businesses (including farms). Use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low or moderate-income individuals or geographies. It has made a relatively high level of community development loans.

Low Satisfactory

Adequate responsiveness to credit needs in its assessment area(s), taking into account the number and amount of home mortgage, small business, small farm, and consumer loans, if applicable, in its assessment area(s). An adequate percentage of its loans are made in its assessment area(s). An adequate geographic

distribution of loans in its assessment area(s). An adequate distribution, particularly in its assessment area(s), of loans among individuals of different income levels and businesses of different sizes (including farms), given the product lines offered by the bank. An adequate record of serving the credit needs of highly economically disadvantaged areas in its assessment area(s), low-income individuals, or businesses (including farms). Limited use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low or moderate-income individuals or geographies. Has made an adequate level of community development loans.

Needs to Improve

Poor responsiveness to credit needs in its assessment area(s), taking into account the number and amount of home mortgage, small business, small farm and consumer loans, if applicable, in its assessment area(s). A small percentage of its loans are made in its assessment area(s). A poor geographic distribution of loans, particularly to low or moderate-income geographies, in its assessment area(s). A poor distribution, particularly in its assessment area(s), of loans among individuals of different income levels and businesses of different sizes (including farms), given the product lines of the bank. A poor record of serving the credit needs of highly economically disadvantaged areas in its assessment area(s), low-income individuals, or businesses (including farms);. Little use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low and moderate-income individuals and geographies. It has made a low level of community development loans.

Substantial Noncompliance

A very poor responsiveness to credit needs in its assessment area(s), taking into account the number and amount of home mortgage, small business, small farm, and consumer loans, if applicable, in its assessment area(s). A very small percentage of its loans made in its assessment area(s). A very poor geographic distribution of loans, particularly in its assessment area(s), of loans among individuals of different income levels and businesses of different sizes (including farms), given the product lines offered by the bank. A very poor record of serving the credit needs of highly economically disadvantaged areas in its



assessment area(s), low-income individuals, or businesses (including farms). No use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low or moderate-income individuals or geographies. It has few, if any community development loans.

Investment Performance

Outstanding

An excellent level of qualified investments, particularly those that are not routinely provided by private investors. Often in a leadership position. Extensive use of innovative or complex, qualified investments. Excellent responsiveness to credit and community development needs.

High Satisfactory

A significant level of qualified investments, particularly those that are not routinely provided by private investors. Occasionally in a leadership position. Extensive use of innovative or complex, qualified investments. Excellent responsiveness to credit and community development needs.

Low Satisfactory

An adequate level of qualified investments, particularly those that are not routinely provided by private investors. Rarely in a leadership position. Occasional use of innovative or complex, qualified investments. Adequate responsiveness to credit and community development needs.

Needs to improve

A poor level of qualified investments, particularly those that are not routinely provided by private investors. Rare use of innovative or complex qualified investments. Poor responsiveness to credit and community development needs.

Substantial noncompliance

Few if any, qualified investments, particularly those that are not routinely provided by private investors. No use of innovative or complex qualified investments. Very poor responsiveness to credit and community development needs.

Service Performance

Outstanding

Its service delivery systems are readily accessible to geographies and individuals of different income levels in its assessment area(s); To the extent changes have been made, its record of opening and closing branches has improved the accessibility of its delivery systems, particularly in low or moderate-income geographies or to low or moderate-income individuals; Its services (including, where appropriate, business hours) are tailored to the convenience and needs of its assessment area(s), particularly low or moderate-income geographies or low or moderate-income individuals; It is a leader in providing community development services.

High Satisfactory

Its service delivery systems are accessible to geographies and individuals of different income levels in its assessment area(s). Its record of opening and closing branches has not adversely effected the accessibility of its delivery systems, particularly in low and moderate-income geographies and to low and moderate-income individuals. Its services (including, where appropriate, business hours) do not vary in a way that inconveniences its assessment area(s), particularly low and moderate-income geographies and low and moderate-income individuals. It provides a relatively high level of community development services.

Low satisfactory

Its service delivery systems are reasonably accessible to geographies and individuals of different income levels in its assessment area(s). Its record of opening and closing branches has generally not adversely effected the accessibility of its delivery systems, particularly in low and moderate-income geographies and to low and moderate-income individuals. Its services (including where appropriate, business hours) do not vary in a way that inconveniences its assessment area(s), particularly low and moderate-income geographies and low and moderate-income individuals. It provides an adequate level of community development services.

Needs to improve

Its service delivery services are unreasonably inaccessible to portions of its assessment area(s),



particularly to low or moderate-income geographies or to low or moderate-income individuals. Its record of opening and closing branches has adversely effected the accessibility of its delivery systems, particularly low or moderate-income geographies, or to low or moderate-income individuals. Its services (including, where appropriate, business hours) vary in a way that inconveniences its assessment area(s), particularly low or moderate-income geographies, or low or moderate-income individuals. It provides a limited level of community development services.

Substantial noncompliance

Its services delivery systems are unreasonably inaccessible to significant portions of its assessment area(s) particularly to low or moderate-income geographies or to low or moderate-income individuals. Its record of opening and closing branches has a significant, adverse effect on the accessibility of its delivery systems, particularly in low or moderate-income geographies, or to low or moderate-income individuals. Its services (including, where appropriate, business hours) vary in a way that significantly inconveniences its assessment area(s), particularly low or moderate-income geographies or low or moderate-income individuals. It provides few, if any, community development services.



Appendix D



Appendix D

Definitions

Income Levels

Low Income

Earning Less than 50% of the Primary Metropolitan Statistical Area's Median Family Income (MFHI).

Moderate Income

Median income level 50% to less than 80% of the MFHI.

Middle Income

Median Income 80% to less than 120% of the MFHI.

Upper Income

Median Income equal to or greater than 120% of MFHI.

Regulations and Regulatory Agencies

FDIC

The Federal Deposit Insurance Corporation (FDIC) is the independent deposit insurance agency created by Congress to maintain stability and public confidence in the nation's banking system. In its unique role as deposit insurer of banks and savings associations, and in cooperation with the other federal and state regulatory agencies, the FDIC promotes the safety and soundness of insured depository institutions and the U.S. financial system, by identifying, monitoring and addressing risks to the deposit insurance funds. In addition, the FDIC gathers data about individual financial institutions and the banking industry. FDIC publications contain information the agency has gathered about the banking industry, including statistical reports and studies that examine current and historical issues in banking and economic trends. There are various data applications that profile the banking industry, analyze national and regional trends, share original research on issues related to banking and deposit insurance, and report on such important issues as emerging risk and underwriting practices. They also compile financial data concerning FDIC-insured institutions. There are historical studies of deposit insurance from its beginnings in the 1930s.

FFIEC

The Federal Financial Institutions Examination Council (FFIEC) was established March 10, 1979. The Council is a formal interagency body, empowered to prescribe uniform principles, standards, and report forms, for federal examination of financial institutions by the Board of Governors of the Federal Reserve System (FRB). The Federal Deposit Insurance Corporation (FDIC), the National Credit Union Administration (NCUA), the Office of the Comptroller of the Currency (OCC) and the Office of Thrift Supervision (OTS). FFIEC makes recommendations to promote uniformity in the supervision of financial institutions. The Council was given additional statutory responsibilities by section 340 of the Housing and Community Development Act of 1980 to facilitate public access to data that depository institutions must disclose under the Home Mortgage Disclosure Act of 1975 (HMDA) and the aggregation of annual HMDA data, by census tract, for each metropolitan statistical area (MSA). The Council has established, in accordance with the requirement of the statute, and advisory State Liaison Committee composed of five representatives of the state supervisory agencies.

HMDA

The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975 and is implemented by the Federal Reserve Bank's 'Regulation C'. This regulation provides the public loan data that can be used to assist in the following: to determine whether financial institutions are serving the housing needs of their communities; to assist public officials in distributing public-sector investments, so as to attract private investments to areas where it is needed; and in identifying possible discriminatory lending patterns. The regulation applies to certain financial institutions, including banks, savings associations, credit unions, and other mortgage lending institutions. Using the loan data submitted by these financial institutions, the Federal Financial Institutions Examination Council (FFIEC) creates aggregate and disclosure reports for each metropolitan statistical area (MSA) that are available to the public at central data depositories located in each MSA.



OCC

The Office of the Comptroller of the Currency (OCC) charters, regulates, and supervises all national banks. It also supervises the federal branches and agencies of foreign banks. The OCC was established in 1863 as a bureau of the U.S. Department of the Treasury. The Office's principal function is the supervision of the national banking system. A staff of over 1,800 bank examiners performs the statutorily required, regular examinations of more than 2,500 banks subject to the Comptroller's supervision. The CRA's implementing regulation requires the OCC to assess a national bank's record of helping to meet the credit needs of its entire community, including low and moderate-income neighborhoods, consistent with safe and sound operations. It also mandates that the agency consider that record, in its evaluation of a bank's application for new branches, relocation of an existing branch, bank mergers and consolidations, and other corporate activities. In general, the OCC conducts a CRA examination of a bank every 24 months.

OTS

The Office of Thrift Supervision (OTS) is the primary regulator of all federal and many state-chartered thrift institutions, which include savings banks and savings and loan associations. The OTS was established as an office of the Department of the Treasury on August 9, 1989. The OTS has five regional offices, located in: Jersey City, Atlanta, Chicago, Dallas, and San Francisco. The Community Reinvestment Act requires the OTS to assess a savings association's record of helping meet the credit needs of its entire community, including low and moderate-income neighborhoods, consistent with safe and sound operations. It also mandates that the agency consider that record, in its evaluation of savings association's application for new branches, relocation of an existing branch, mergers and consolidations, and other corporate activities. In general, the OTS conducts a CRA examination of savings associations every 24 months. A written evaluation of the savings association's CRA activities, including a CRA rating, is prepared at the end of each CRA examination. Pursuant to the CRA, savings associations are assigned one of four statutory ratings: Outstanding, Satisfactory, Needs to Improve, Substantial Noncompliance



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